P.O. Box 1049, 1800 WaterMark Dr. lumbus, Ohio 43266-0149 14) 644-3020 FAX (614) 644-2329 RECEIVED JUN 1 8 1993
WMD RCRA
RECORD CENTER

George V. Voinovich
Governor

Donald R. Schregardus Director

April 6, 1993

RE: AMENDED CLOSURE PLAN EXTENSION GENERAL ELECTRIC COMPANY OHIO LAMP PLANT

OHD 066 052 804

CERTIFIED MAIL

Mr. Howard Russell Manufacturing and Environmental Engineering 1210 N. Park Ave. Warren, Ohio 44483

Dear Mr. Russell:

On February 26, 1993, General Electric Company, Ohio Lamp Plant, located at 1210 N. Park Ave., Warren, Ohio, submitted a request for an extension to the alexander peculied in the alexanded closure plan dated August 29, 1990 for 180 days, until September 21, 1993. The autension request was submitted pursuant to OAC Rule 3745-66-13(B) as closure will require longer than the 180 day period specified in OAC Rule 3745-66-13. General Electric Company, Ohio Lamp Plant has requested this extension because analytical results are expected by February 26, 1993. Only after receiving analytical data, can General Electric, Ohio Lamp arrange for proper disposal of soils.

My staff reviewed your request and recommends that the extension be granted per Rule 3745-66-13(B) of the OAC. I concur and am therefore granting this extension request. This extension is being granted for the above referenced closure plan and expires on September 21, 1993.

General Electric Company, Ohio Lamp Plant shall continue to take all steps to prevent a threat to human health and the environment from the unclosed but inactive waste management unit per OAC Rule 3745-66-13(B)(2).

Please be advised that approval of this closure extension request does not release General Electric Company, Ohio Lamp Plant from any responsibilities as required under the Hazardous and Solid Waste Amendments of 1984 regarding corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit.

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Cavin Date 4-6-93

OHIO E.P.A.

APR -6 93

ENTERED DIRECTOR'S JOURNAL

Mr. Howard Russell

When closure is completed, the Ohio Administrative Code Rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of the Ohio EPA certification by the owner or operator and an independent professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. These certifications shall follow the format specified in OAC 3745-50-42(D), and should be submitted to: Ohio Environmental Protection Agency, Division of Hazardous Waste Management, Attn: Tom Crepeau, Data Management Section, P.O. Box 0149, Columbus, OH 43226-1049.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the ground upon which the appeal is based. This appeal must be filed with the Environmental Board of Review within thirty (30) days from the receipt of this letter. A copy of the appeal must be served to the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Board. An appeal must be filed at the following address:

Environmental Board of Review 236 East Town Street Room 300 Columbus, OH 43215

Sincerely,

Donald R. Schregardus

Director

DRS/alf/fwn

CC: Tom Crepeau, DHWM Central File, Ohio EPA
Section Chief, Ohio Permit Section, U.S. EPA - Region V
Randy Meyer, Ohio EPA, DHWM, CO
Adrienne LaFavre, Ohio EPA, DHWM, NEDO

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Cavin Date 4-6-93

OHIO E.P.A.

APR -6 93

.NTERED DIRECTOR'S JOURNAL

Part to Reid. 10/20/92

State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr. Columbus, Ohio 43266-0149 (614) 644-3020 FAX (614) 644-2329

George V. Voinovich Governor

AMENDED CLOSURE PLAN APPROVAL

September 25, 1992

CERTIFIED MAIL

RE: AMENDED CLOSURE PLAN
GENERAL ELECTRIC COMPANY
OHIO LAMP PLANT
OHD 066 052 804
02-78-0153

Mr. Howard Russell General Electric Company Ohio Lamp Plant 1210 North Park Ave. Warren, Ohio 44483

Dear Mr. Russell:

On September 10, 1990, General Electric Company - Ohio Lamp Plant submitted to Ohio EPA an amended closure plan for a drum storage area located at 1210 North Park Ave., Warren, Ohio. The amended closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that General Electric Company - Ohio Lamp Plant's proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the amended closure plan of General Electric Company - Ohio Lamp Plant in accordance with OAC Rule 3745-66-12. No comments were received by Ohio EPA in this matter.

Based upon review of General Electric Company - Ohio Lamp Plant's submittal, I conclude that the amended closure plan for the hazardous waste facility at 1210 North Park Ave., Warren, Ohio, as modified herein, meets the performance standard contained in OAC Rule 3745-66-11 and complies with the pertinent parts of OAC Rule 3745-66-12.

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Cavin Date 9-25-92

Ohio Environmental Protection Agency ENTERED DIRECTOR'S JOURNAL

Mr. Howard Russell General Electric Company Page Two

The amended closure plan submitted to Ohio EPA on September 10, 1990 by General Electric Company - Ohio Lamp Plant is hereby approved with the following modifications:

- The owner/operator and the independent registered professional engineer must certify closure using signature requirements found in OAC 3745-50-42. The certification document must include the following: a) certification statement including the exact wording found in OAC 3745-50-42(D); b) the approved closure plan or reference to the approved plan; c) the volume of waste removed or closed in place; d) all correspondence regarding closure activity after Ohio EPA approval; e) details of sampling and analysis methods; f) laboratory records; g) a narrative describing all activities during closure; h) details, including as-built drawings, for landfill closures; i) post-closure clean-up documentation; and j) signature of owner/operator and of a qualified, independent, registered, professional engineer.
- 2) The Amended Closure Plan proposes collecting six (6) background samples. Twelve background samples are required. General Electric Company Ohio Lamp Plant must adhere to the guidelines presented in the Closure Plan Review Guidance for collecting samples and manipulating data.

Background samples will be taken 6 and 16 feet west of sample area 2, and 6 and 16 feet east of sample area 1. Samples at three depths must be collected with the deepest sampling at the soil/slag interface. Total mercury levels must be determined for reach sample and a TCLP analysis done on the sample with the highest concentration.

- 3) If the results of past sampling are above background, General Electric Ohio Lamp Plant will submit a detailed soil sampling plan for determining the full horizontal and vertical extent of contamination for both sampling areas. Ohio EPA considers both areas as potentially contaminated.
- 4) TCLP analysis will replace ET Tox mercury analysis.

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Care Date 9-25-92

Ohio Environmental Protection Agency Entered Director's Journal Mr. Howard Russell General Electric Company Page Three

Please be advised that approval of this amended closure plan does not release General Electric Company - Ohio Lamp Plant from any responsibilities as required under the Hazardous and Solid Waste Amendments of 1984 regarding corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit.

Notwithstanding compliance with the terms of the closure plan, the Director may, on the basis of any information that there is or has been a release of hazardous waste, hazardous constituents, or hazardous substances into the environment, issue an order pursuant to Section 3734.20 et seq of the Revised Code or Chapters 3734 or 6111 of the Revised Code requiring corrective action or such other response as deemed necessary; or initiate appropriate action; or seek any appropriate legal or equitable remedies to abate pollution or contamination or to protect public health or safety or the environment.

Nothing here shall waive the right of the Director to take action beyond the terms of the closure plan pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.A. §9601 et seq., as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. 99-499 ("CERCLA") or to take any other action pursuant to applicable Federal or State law, including but not limited to the right to issue a permit with terms and conditions requiring corrective action pursuant to Chapters 3734 or 6111 of the Revised Code; the right to seek injunctive relief, monetary penalties and punitive damages, to undertake any removal, remedial, and/or response action relating to the facility, and to seek recovery for any costs incurred by the Director in undertaking such actions.

You are notified that this action of the director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address: Environmental Board of Review, 236 East Town Street, Room 300, Columbus, Ohio 43266-0557.

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Cavin Date 9-25-92 Ohio Environmental Protection Agency ENTERED DIRECTOR'S JOURNAL

Mr. Howard Russell General Electric Company Page Four

When closure is completed, the Ohio Administrative Code Rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of the Ohio EPA certification by the owner or operator and an independent, registered professional engineer that the facility has been closed in accordance with the approved closure plan. The certification by the owner or operator shall include the statement found in OAC 3745-50-42(D). These certifications should be submitted to: Ohio Environmental Protection Agency, Division of Hazardous Waste Management, Attn: Thomas Crepeau, Data Management Section, P.O. Box 1049, Columbus, Ohio 43266-0149.

Sincerely,

bonald R. Schregardus

Director Ohio EPA

DRS/ /fwn

CC: Tom Crepeau, DHWM, CO, Ohio EPA Randy Meyer, DHWM, CO, Ohio EPA

Acting Section Chief, Ohio Permit Section, U.S. EPA - Region V Adrienne LaFavre, DHWM, NEDO, Ohio EPA Frank Popotnik, DHWM, NEDO, Ohio EPA

I certify this to be a true and accurate copy of the official document as filled in the records of the Ohio Environmental Protection Agency.

By: Mary Cavin Date 9-25-92

Ohio Environmental Protection Agency Entered Director's Journal



State of Ohio Environmental Protection Agency

Do Box 1049, 1800 WaterMark Dr. Columbus, Ohio 43266-0149 (614) 644-3020 Fax (614) 644-2329

par

Richard F. Celeste Governor

September 17, 1990

Re: GE/Ohio Lamp Plant

U.S. EPA ID No.: OHD066052804 Ohio Permit No.: 02-78-0153 Amendment to Closure Plan

General Electric Company/Ohio Lamp Plant Attn: Mr. Robert Whitmore 1210 N. Park Warren, Ohio 44483

Dear Mr. Whitmore:

A public notice acknowledging the Ohio EPA's receipt of an amendment to the closure plan for the General Electric Company/Ohio Lamp Plant located at 1210 N. Park, Warren, Ohio will appear the week of September 17, 1990, in the Warren Tribune Chronicle, Warren, Ohio. The Director of the Ohio EPA will act upon the amendment to the closure plan request following the close of the public comment period, October 24, 1990.

Copies of the amendment to the closure plan will be available for public review at the Warren Public Library, 444 Mahoning Avenue NW, Warren, Ohio 44483 and the Ohio EPA, Northeast District Office, 2110 E. Aurora Road, Twinsburg, Ohio 44087.

I may be contacted at (614) 644-2977 if you have any questions concerning this matter.

Very truly yours.

Moucas & Crepeace
Thomas E. Crepeau, Manager

Data Management Section

Division of Solid & Hazardous Waste Management

TC/RS/ds

cc: Lisa Pierard, U.S. EPA, Region V Randy Meyer, Ohio EPA, DSHWM, RCRA TAS Mark Bergman, Ohio EPA, DSHWM, NEDO

2538R(59)

RECEIPT OF AMENDMENT TO HAZARDOUS WASTE CLOSURE PLAN

For: General Electric Company/Ohio Lamp Plant, 1210 N. Park, Warren, Ohio 44483, U.S. EPA ID No.: OHDO66052804, Ohio Permit No.: 02-78-0153. Pursuant to OAC Rule 3745-66-10 thru 17 and 40 CFR, Subpart G, 265.110 thru 117, the Ohio Environmental Protection Agency (Ohio EPA) is hereby giving notice of the receipt of an Amendment to the Hazardous Waste Facility Closure Plan for a Hazardous Waste Drum Storage Area for the above referenced facility. Ohio EPA is also giving notice that this facility is subject to a determination concerning corrective action, a requirement under the Hazardous and Solid Waste Amendments of 1984, which concerns any possible uncorrected releases of hazardous waste or hazardous constituents to the environment from any current or previous solid waste management units at the above facility. A corrective action determination is required from hazardous waste facilities intending to close.

Copies of the facility's Amendment to the Closure Plan will be available for public review at the Warren Public Library, 444 Mahoning Avenue, Warren, Ohio 44483 and the Ohio EPA, Northeast District Office, 2110 E. Aurora Road, Twinsburg, Ohio 44087. Comments concerning the Amendment to the Closure Plan or factual information concerning any releases of hazardous waste or hazardous waste constituents by the above facility requiring corrective action should be submitted within 30 days of this notice to: Ohio Environmental Protection Agency, Div. of Solid & Hazardous Waste Mgmt., Data Management Section, Attn: Thomas E. Crepeau, Box 1049, Columbus, Ohio 43266-0149.



"tate of Ohio Environmental Protection Agency

O. Box 1049, 1800 WaterMark Dr. Contimbus, Ohio 43266-0149
644-3020 Fax (814) 644-2329

Richard F. Celeste Governor

August 6, 1990

Mr. Howard Russell General Electric-Ohio Lamp 1210 N. Park Avenue Warren, Ohio 44483

Re: Clean closure of the drum storage area

Dear Mr. Russell:

Ohio EPA has reviewed the letter from your consultant, Killam Associates dated June 7, 1990. The letter requests some alternate clean standards other than those in the approved closure plan. Apparently, the paved surface of the drum storage area has been decontaminated completely as shown by the rinseate tests.

Soils near the drains were found to contain elevated pH, methylene chloride, and mercury. Ohio EPA agrees with Killam that the contamination from methylene chloride may be an artifact of the laboratory analysis and not actual soil contamination since the blank sample had a greater concentration of methylene chloride than the soils analyzed. However, the only way to confirm this is to resample the soils adhering to strict quality assurance and quality control both in the field and in the laboratory (it will be useful to split samples and allow two different laboratories to analyzed the samples).

The slightly elevated pH reading is indicative of contamination of some kind in areas 2a-2c but the risks posed by the elevated pH are minimal in this instance. Ohio EPA is concerned about the mercury contamination in the soil. Risk assessments using "best professional judgement" are not acceptable for hazardous constituents like mercury. GE-Ohio Lamp may submit a risk assessment to address the mercury contamination in the soils. Note the attachment which outlines the expectations of Ohio EPA regarding preparation of closure risk assessments. GE-Ohio Lamp may also wish to excavate the contaminated soil and dispose of it properly. In either case, GE shall submit a revision to the closure plan to encompass the changes in the closure of the unit.

If you have any questions, please feel free to contact Mark Bergman, Ohio EPA, NEDO (216-425-9171) or Paul Vandermeer, Ohio EPA, DSHWM (614-644-2956).

Sincerely,

Edward A. Lithen

Edward A. Kitchen, Manager Technical Assistance Section Division of Solid and Hazardous Waste Management

cc Mark Bergman, OEPA, NEDO Paul Vandermeer, OEPA, DSHWM .O. Box 1049, 1800 WaterMark Dr. Columbus, Ohio 43266-0149

Richard F. Celeste Governor

CLOSURE PLAN EXTENSION APPROVAL

CERTIFIED MAIL

July 18, 1990

Re: Closure Plan Extension General Electric Ohio Lamp OHD066052804

Mr. Rick A. Myers General Electric Ohio Lamp c/o Killam Associates Thorn Hill Industrial Park 100 Allegheny Drive Warrendale, PA. 15086-7565

Dear Mr. Myers:

On June 14, 1990, General Electric Ohio Lamp submitted a request for an extension to the closure period specified in the approved closure plan until September 28, 1990. The extension request was submitted pursuant to Rule 3745-66-13(B) of the Ohio Administrative Code (OAC) as closure will require longer than the 180 day period specified in OAC Rule 3745-66-13. General Electric Ohio Lamp has requested this extension of time due to the discovery of unexpected soil contamination.

General Electric Ohio Lamp will continue to take all steps to prevent a threat to human health and the environment from the unclosed but inactive waste management unit per OAC Rule 3745-66-13(B)(2).

An extension of time allowed for closure is hereby granted until September 28, 1990.

Please be advised that approval of this closure extension request does not release General Electric Ohio Lamp from any responsibilities as required under the Hazardous and Solid Waste Amendments of 1984 regarding corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit.

When closure is completed, the Ohio Administrative Code Rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of the Ohio EPA certification by the owner or operator and a qualified, independent, registered professional engineer that the facility has been closed in accordance with the approved closure plan. The certification by the owner or operator shall include the statement found in OAC 3745-50-42(D). These certifications should be submitted to: Ohio Environmental Protection Agency, Division of Solid and Hazardous Waste Management, Attn: Thomas Crepeau, Data Management Section, P.O. Box 1049, Columbus, Ohio 43266-0149.

Since 1y,

Richard L. Shank, Ph.D.

RLS/PLV

cc: Paul L. Vandermeer, Ohio EPA, DSHWM
Lisa Pierard, USEPA, Region V
Joel Morbito, USEPA, Region V
Tom Crepeau, Ohio EPA, DSHWM Central File
Mark Bergman, Ohio EPA, NEDO



te of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr. Columbus, Ohio 43266-0149





CLOSURE PLAN EXTENSION APPROVAL

Richard F. Celeste Governor

CERTIFIED MAIL

March 26, 1990

Re: Closure Plan Extension General Electric, Ohio Lamp OHD 066 052 804

Mr. Scott A. Nesbit General Electric, Ohio Lamp c/o Killam Associates DLA Division Thorn Hill Industrial Park 100 Allegheny Drive Warrendale, PA 15086-7565

Dear Mr. Nesbit:

On January 12, 1990, General Electric, Ohio Lamp Plant submitted a request for an extension to the closure period specified in the approved closure plan for 180 days. The extension request was submitted pursuant to OAC Rule 3745-66-13(B) as closure will require longer than the 180 days period specified in OAC Rule 3745-66-13. General Electric, Ohio Lamp Plant has requested this extension due to difficulties in meeting the clean standards.

Therefore, closure of the drum storage area will require greater than 180 days because of difficulties in meeting the clean standards. General Electric, Ohio Lamp Plant will continue to take all steps to prevent a threat to human health and the environment from the closed but inactive waste management unit per OAC Rule 3745-66-13(B)(2).

The public was given the opportunity to submit written comments regarding the request for an extension to the closure period for General Electric, Ohio Lamp Plant in accordance with OAC Rule 3745-66-13. The public notice appeared in the week of January 22, 1990, in the <u>Warren Tribune Chronicle</u>. No comments were received in this matter.

A 180 day extension of time (until July 1, 1990) to complete closure is hereby granted.

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Civin Date 3-26-90

Ohio Environmental Protection Agency ENTERED DIRECTOR'S JOURNAL

MAR 2 6 1990

... Plus approved 7/6/89

Mr. Nesbit Page Two

Please be advised that approval of this closure extension request does not release General Electric, Ohio Lamp Plant from any responsibilities as required under the Hazardous and Solid Waste Amendments of 1984 regarding corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit.

When closure is completed, the Ohio Administrative Code Rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of the Ohio EPA certification by the owner or operator and a registered professional engineer that the facility has been closed in accordance with the approved closure plan. The owner or operator certification shall follow the format specified in OAC 3745-50-42(D). These certifications should be submitted to: Ohio Environmental Protection Agency, Division of Solid and Hazardous Waste Management, Attn: Tom Crepeau, Data Management Section, P.O. Box 1049, Columbus, Ohio 43266-0149.

You are notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency and the Environmental Enforcement Section of the Office of the Attorney General within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address: Environmental Board of Review, 250 East Town Street, Room 101, Columbus, Ohio 43266-0557.

Sincerelly

Richard L. Shank, Ph.D.

Director

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Caven Date 3-26-90

RLS/PV/pas

cc: Tom Crepeau, DSHWM Central File, Ohio EPA

Lisa Pierard, USEPA, Region V Mark Bergman, NEDO, Ohio EPA Paul Vandermeer, DSHWM, Ohio EPA Joel Morbito, USEPA, Region V

Ohio Environmental Protection Agency Entered Director's Journal

Dan



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr. Columbus, Ohio 43266-0149

Richard F. Celeste Governor

CLOSURE PLAN APPROVAL

CERTIFIED MAIL

RECEIVED

JUL 0 6 1989

OFFICE OF HORA
Waste Management Division

Mr. Howard Russell U.S. EPA, REGION V. General Electric - Ohio Lamp 1210 N. Park Avenue Warren. Ohio 44483

Re: Closure Plan General Electric - Ohio Lamp OHD 066 052 804/02-78-0153

> Ohio Environmental Protection Agency Entered Director's Journal

> > JUL 0 6 1989

Dear Mr. Russell:

On September 22, 1988, General Electric - Ohio Lamp submitted to Ohio EPA a closure plan for a hazardous waste drum storage area located at 1210 N. Park Ave., Warren, Ohio. Revisions to the closure plan were received on February 28, 1989. The closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that General Electric - Ohio Lamp's proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the closure plan of General Electric - Ohio Lamp in accordance with OAC Rule 3745-66-12. No comments were received by Ohio EPA in this matter.

Based upon review of the company's submittal and subsequent revisions, I conclude that, with modifications, the closure plan for the hazardous waste facility at General Electric - Ohio Lamp meets the performance standard contained in OAC Rule 3745-66-11 and complies with the pertinent parts of OAC Rule 3745-66-12.

The closure plan submitted to Ohio EPA by General Electric - Ohio Lamp is hereby approved with the following modifications:

- The revised closure plan mentions that the independent, registered professional engineer (PE) will be present during all sampling events. The independent PE shall also be present during inventory removal, pad decontamination, and for inspection of the concrete pad surface prior to decontamination.
- The revised closure plan states that the GE employees will inspect and evaluate all cracks in the cement flooring of the storage pad. GE shall have the independent PE provide this inspection rather than, or in addition to, GE employees.

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Caroly: needsinus Date 7/6/89

- 3. The closure plan does not address the actions to be taken by the company if structural cracks in the pad penetrate the pad surface. GE shall sample soils beneath such penetrating structural cracks to similar depths as those proposed for the drains (0-6", 12"-18" and 24"-30"). Each crack shall be sampled along its length, one sample boring for every six (6) linear feet of crack.
- 4. GE shall notify Mark Bergman, Ohio EPA, NEDO, at least 10 days prior to all critical closure activities so that he may be present to observe these activities and collect split samples if desired.
- 5. GE fails to describe the sampling scoops used for soil sampling in an adequate fashion. The sampling scoop shall be of stainless steel construction and be decontaminated after each sampling event using rinses of both distilled water and acetone. All decontamination rinseate shall be managed appropriately (i.e., spent acetone rinseate shall be managed as hazardous waste).
- 6. The clean level for pH proposed by GE is unacceptable. GE shall establish background for pH or use the range (4.7-9.0 S.U.). Background soil pH shall be established from background soil samples taken in areas that are not impacted by any waste management activities. A minimum of sixteen (16) background sample borings is required with samples taken in each boring from soil horizons corresponding to soil horizons underneath the unit. All background sampling results shall be subject to Ohio EPA scrutiny and possible rejection.
- 7. Rinsewaters generated from equipment decontamination efforts shall be collected, tested, and appropriately managed along with rinseates generated from pad decontamination efforts.
- 8. GE shall specify the name, identification number, and type of permitted hazardous waste treatment storage or disposal facility (TSDF) contracted to manage hazardous wastes generated from closure activities. If more than one waste management facility is chosen, then GE shall provide the needed information for each. This information shall be submitted along with the information on the testing laboratory QA/QC prior to waste disposal.

Notwithstanding compliance with the terms of the closure plan, the Director may, on the basis of any information that there is or has been a release of hazardous waste, hazardous constituents, or hazardous substances into the environment, issue an order pursuant to Section 3734.20 et seq. of the Revised Code or Chapters 3734 or 6111 of the Revised Code requiring corrective action or such other response as deemed necessary; or initiate appropriate action; or seek any appropriate legal or equitable remedies to abate pollution or contamination or to protect public health or safety or the environment.

Obio Environmental Protection Agency FATERED DIRECTOR'S JOURNAL

I certify this to be a true and ancurate copy of the official distinct as filed in the records of the Ohio Environmental Protection Agency.

JAF 0 0 1888

By: Caroly Mcoderius Date 7/6/89

Nothing herein shall waive the right of the Director to take action beyond the terms of the closure plan pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. §9601 et seq., as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. 99-499 ("CERCLA") or to take any other action pursuant to applicable Federal or State law, including but not limited to the right to issue a permit with terms and conditions requiring corrective action pursuant to Chapters 3734 or 6111 of the Revised Code; the right to seek injunctive relief, monetary penalties and punitive damages, to undertake any removal, remedial, and/or response actions relating to the facility, and to seek recovery for any costs incurred by the Director in undertaking such actions.

You are notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency and the Environmental Enforcement Section of the Office of the Attorney General within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address: Environmental Board of Review, 236 East Town Street, Room 300, Columbus, Ohio 43266-0557

When closure is completed, the Ohio Administrative Code Rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of the Ohio EPA certification by the owner or operator and a registered professional engineer that the facility has been closed in accordance with the approved closure plan. The certification by the owner or operator shall include the statement found in OAC 3745-50-42(D). These certifications should be submitted to: Ohio Environmental Protection Agency, Division of Solid and Hazardous Waste Management, Attn: Thomas Crepeau, Program Planning and Management Section, P.O. Box 1049, Columbus, Ohio 43266 0149.

Sincerely,

Richard L. Shank, Ph.D.

Director

RLS/PV/pas

cc: Paul Vandermeer, Ohio EPA, DSHWM
Lisa Pierard, US EPA-Region V
Joel Morbito, USEPA - Region V
Tom Crepeau, Ohio EPA, DSHWM Central File
Mark Bergman, NEDO, Ohio EPA

1873U

Ohio Environmental Protection Agency ENTERED DIRECTOR'S JOURNAL

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio

By: Carolyn Mccodenius Date 7/6/89

duncan, lagnese & associates, inc.

3185 BABCOCK BOULEVARD, PITTSBURGH, PA. 15237 TELEPHONE: (412) 931-8400 • (412) 364-5403

consulting engineers

DECEIVED FEB 27 1989

U.S. E.A. REGION V

February 24, 1989



RE: MODIFIED CLOSURE PLAN GENERAL ELECTRIC COMPANY OHIO LAMP PLANT OHD 066 052 804

Scott A. Neslit

Dear Ms. Pierard:

In accordance with the Ohio Environmental Protection Agency's closure Plan disapproval letter of January 24, 1989, the General Electric Company, Ohio Lamp Plant has modified the closure plan submitted to you on September 22, 1988. Enclosed you will find a copy of the modified closure plan for your review.

If you have any comments on the plan, please contact Mr. Howard Russell of General Electric at 216/373-1400.

Sincerely yours,

Scott A. Nesbit Engineer

SAN:mag/0029g

Enclosure

cc/encl: Mr. Mark Bergman, OEPA, Twinsburg

Mr. Thomas Crepeau, OEPA, Columbus



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr. Columbus, Ohio 43266-0149





Richard F. Celeste Governor

January 24, 1989

CLOSURE PLAN DISAPPROVAL Issuance Date JAN 2 4 1989 Effective Date EB 2.7 1989

CERTIFIED MAIL

Re: Closure Plan General Electric Co. - Ohio Lamp OHD 066 052 804/02-78-0153

Mr. Howard Russell General Electric Co. - Ohio Lamp 1210 N. Park Ave. Warren. Ohio 44483

Dear Mr. Russell:

On September 22, 1988, General Electric Co. - Ohio Lamp submitted to Ohio EPA a closure plan for a hazardous waste drum storage area located at 1210 N. Park Ave. Warren, Ohio. The closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that General Electric Co. - Ohio Lamp's proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the closure plan of General Electric Co. - Ohio Lamp in accordance with OAC Rule 3745-66-12. The public comment period extended from October 24, 1988, to December 1, 1988. No comments were received by Ohio EPA in this matter.

Based upon review of the company's submittal and subsequent revisions, I conclude that the closure plan for the hazardous waste facility at General Electric Co. - Ohio Lamp does not meet the performance standard contained in OAC Rule 3745-66-11 and does not comply with the pertinent parts of OAC Rule 3745-66-12.

The closure plan submitted to Ohio EPA by General Electric Co. - Ohio Lamp is hereby disapproved (see Attachment A).

Due to the fact that the Ohio EPA is not currently authorized to conduct the federal hazardous waste program in Ohio, your closure plan also must be reviewed by USEPA. Federal RCRA closure regulations (40 CFR 265.112) require that you submit a closure plan to Lisa Pierard, Chief, Waste Management Division, Technical Programs Section, Ohio Unit, USEPA, Region V, 5HS-13, 230 South Dearborn Street, Chicago, Illinois 60604. Review and approval of the closure plan by both agencies is necessary prior to commencement of activities required by the approved closure plan.

You are notified that this action of the Director is issued as a proposed action pursuant to ORC Section 3745.07. This action will become final on the effective date indicated unless you or an objector files an appeal requesting an adjudication hearing within thirty (30) days of the date of issuance of this action. The adjudication hearing will be conducted in accordance with OAC Chapter 3745-47. The request for a hearing shall specify the issues of fact and law to be contested. Requests for hearings shall be sent to: Ohio Environmental Protection Agency, Hearing Clerk, 1800 WaterMark Drive, P.O. Box 1049, Columbus, OH 43266-0149.

A modified closure plan addressing the deficiencies enumerated in Attachment A must be submitted to the Director of the Ohio EPA for approval within thirty (30) days of the receipt of this letter in accordance with OAC 3745-66-12 and 3745-66-18. The modified closure plan should be submitted to: Ohio Environmental Protection Agency, Division of Solid and Hazardous Waste Management, Attn: Thomas Crepeau, Manager, Data Management Section, P.O. Box 1049, Columbus, Ohio 43266-0149. A copy should also be sent to: Mark Bergman, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087, (216)425-9171.

Sincerely.

Richard L. Shank, Ph.D.

Director

RLS/PV/ps

cc: DSHWM Central File, Ohio EPA Lisa Pierard, USEPA, Region V Mark Bergman, NEDO, Ohio EPA Paul Vandermeer, DSHWM, Ohio EPA

ATTACHMENT A General Electric Co. - Ohio Lamp

- The schedule for closure shall specify the critical events during closure when the independent, registered professional engineer will be present.
- 2. The Part A application submitted by GE Ohio Lamp in 1980 lists three waste streams (D001/U151, D003, and D001/U154) which are not addressed in the closure plan. The company shall provide justification for these omissions.
- 3. The company shall provide a site-specific detailed personnel health and safety section within the closure plan. This section shall include, but not be limited to, specifics regarding protective clothing and equipment for personnel performing closure, protection for contractors and visitors, decontamination procedures for personnel, fire prevention and protection, etc.
- 4. GE-Ohio Lamp shall consider sweeping the storage area with a broom or vacuum prior to high pressure washing.
- 5. GE-Ohio Lamp shall evaluate the concrete surface of the storage pad prior to pressure washing. Cracks and crevices shall be noted and the company shall provide details as to how rinseate will be collected (and not allowed to escape through the cracks to the ground below) after washing is complete. The company shall use temporary measures to prevent rinseates from escaping through the twelve (12) inch drains.
- 6. GE-Ohio Lamp shall provide detailed drawings and explanations for the two (2), twelve (12) inch drains and any subsequent pathway they follow (i.e. where do the drain lines lead?). Soil sampling efforts shall be revised to reflect the entire drain pathway and not just soils immediately surrounding the floor opening as proposed in the closure plan. Soil sampling borings shall be shown on a map of the area. The company shall determine both the vertical and horizonal extent of soil contamination if soils are found to be contaminated.
- 7. The drum storage area shall be considered clean when concentrations of hazardous wastes or hazardous waste constituents in the rinseate fall below the maximum contaminant level (MCL) as promulgated in OAC 3745-81-11 for inorganics and OAC 3745-81-12 for organics. If an MCL is unavailable for a particular contaminant, then the maximum contaminant level goal (MCLG) shall be used as the clean standard (see

40 CFR 141.50). If neither an MCL or MCLG is available for a particular contaminant, then 1 mg/l shall be used as the clean standard. If the MCL or MCLG is less than the contaminant's analytical detection limit (ADL) using methods found in USEPA Publication SW-846 (Test Methods for Evaluating Solid Waste Physical/Chemical Methods), then the SW-846 ADL shall be used as the clean standard. Rinseates containing concentrations of hazardous constituents above those stated here shall be managed as hazardous waste.

- 8. The company shall specify the appropriate SW-846 methods to be used to search for the various hazardous waste constituents that may be found in rinseates or soils. These analytical tests shall reflect the hazardous wastes stored at the unit in addition to analysis for pH, total mercury, EP Toxic mercury, and methanol.
- 9. GE-Ohio Lamp shall provide evidence of the QA/QC program for the laboratory conducting the chemical analyses and ensure that the laboratory is capable of conducting the appropriate tests as per USEPA Publication SW-846 This information shall be provided when GE-Ohio Lamp decides to contract with a specific laboratory.
- 10. The company shall indicate the type(s) of waste management facilities that will be managing the hazardous wastes generated on-site, especially any contaminated soils.
- 11. Soil samples shall be analyzed from each depth indicated to ensure that percolation of contaminants has not occurred through the top soil layers into underlying soils. Analysis of only the upper soil layer may show clean conditions when contaminants have already migrated through the surface layer into the soil layers beneath.
- 12. The company shall include a blank (unsigned) certification statement within the closure plan. Certification is performed when closure has been completed according to the approved closure plan. A signed statement shall be provided upon completion.



State of Ohio Environmental Protection Agency

. O. Box 1049, 1800 WaterMark Dr. Columbus, Ohio 43266-0149



Richard F. Celeste Governor

October 27, 1988

Re: GE/Ohio Lamp Plant

U.S. EPA ID No.: OHD066052804 Ohio Permit No.: 02-78-0153

Closure Plan

GE/Ohio Lamp Plant Attn: Howard Russell 1210 N. Park Avenue Warren, Ohio 44483

Dear Sir:

A public notice acknowledging the Ohio EPA's receipt of a closure plan for GE/Ohio Lamp Plant located at 1210 N. Park Avenue, Warren, Ohio 44483 will appear the week of October 24, 1988, in the Warren Tribune Chronicle, Warren, Ohio. The Director of the Ohio EPA will act upon the closure plan request following the close of the public comment period, December 1, 1988.

Copies of the closure plan will be available for public review at the Warren Public Library, 444 Mahoning Avenue NW, Warren, Ohio 44483 and the Ohio EPA, Northeast District Office, 2110 E. Aurora Road, Twinsburg, Ohio 44087.

Please contact me at (614) 644-2934, if you have any questions concerning this matter.

Very truly yours,

Thomas E. Crepeau, Manager

Data Management Section

Division of Solid & Hazardous Waste Management

TEC/dhs

cc: Rebecca Strom, U.S. EPA, Region V Randy Meyer, Ohio EPA, DSHWM, TA&ES Dave Wertz, Ohio EPA, DSHWM, NEDO

Mouras E. Crepeau

2215R(50)

PUBLIC NOTICE

RECEIPT OF HAZARDOUS WASTE CLOSURE PLAN

For: GE/Ohio Lamp Plant, 1210 N. Park Avenue, Warren, Ohio 44483, U.S. EPA ID No.: OHDO66052804, Ohio Permit No.: O2-78-0153. Pursuant to OAC Rule 3745-66-10 thru 17 and 40 CFR, Subpart G, 265.110 thru 117, the Ohio Environmental Protection Agency (Ohio EPA) is hereby giving notice of the receipt of a Hazardous Waste Facility Closure Plan for a container storage unit for the above referenced facility. Ohio EPA is also giving notice that this facility is subject to a determination concerning corrective action, a requirement under the Hazardous and Solid Waste Amendments of 1984, which concerns any possible uncorrected releases of hazardous waste or hazardous constituents to the environment from any current or previous solid waste management units at the above facility. A corrective action determination is required from hazardous waste facilities intending to close.

Copies of the facility's Closure Plan will be available for public review at the Warren Public Library, 444 Mahoning Avenue NW, Warren, Ohio 44483 and the Ohio EPA, Northeast District Office, 2110 E. Aurora Road, Twinsburg, Ohio 44087. Comments concerning the Closure Plan or factual information concerning any releases of hazardous waste or hazardous waste constituents by the above facility requiring corrective action should be submitted within 30 days of this notice to: Ohio Environmental Protection Agency, Div. of Solid & Hazardous Waste Mgmt., Data Management Section, Attn: Thomas E. Crepeau, Box 1049, Columbus, Ohio 43266-0149.



LAMP ASSEMBLY PRODUCTION DEPARTMENT—OHIO LAMP PLANT
GENERAL ELECTRIC COMPANY • 1210 NORTH PARK AVENUE • WARREN, OHIO 44483 • (216) 373-1400

September 14, 1988

Mr. Thomas Crepeau
Ohio Environmental Protection Agency
Division of Solid and Hazardous
Waste Management
1800 Watermark Drive
Columbus, Ohio 43215

RE

CONTAINER STORAGE CLOSURE PLAN GENERAL ELECTRIC COMPANY OHIO LAMP PLANT SEP 2 % 1988

OFFICE OF RCRA
Wasta Marragement Division
U.S. EPA, REGION V

Dear Mr. Crepeau:

Enclosed are three copies of a closure plan for the closure of a drum storage unit located at the plant. The plan is submitted to satisfy 40 CFR 265.112(c) and OAC 3745-66-12(c) concerning closure of a hazardous waste management unit.

If you have any questions regarding the contents of this plan, please contact Howard Russell at 216-373-1400.

Sincerely

Peter T. Machuga

Plant Manager - Ohio Lamp Plant

mau

CC:

Mark Bergman - OEPA

Rebecca Strom - USEPA



DLA Division

Thorn Hill Industrial Park 100 Allegheny Drive Warrendale, PA 15086-7565 Telephone 412-772-0200 Face 412-772-1955

August 29, 1990

Ohio Environmental Protection Agency
Division of Solid and Hazardous Waste Management
PO BOX Box 1049
Columbus, Ohio 43266-0149

ATTENTION: Paul Vandermeer

KILLAM PROJECT NO. 2G018 CLOSURE PLAN MODIFICATIONS GENERAL ELECTRIC COMPANY - OHIO LAMP PLANT OEPA ID NO. OHD 066 052 804

Gentlemen:

of soils adjacent to the storage unit, outside of the building, beneath a floor vent. Lamp Plant RCRA storage unit. The plan has been modified to address the sampling and analysis Attached is a closure plan modification for the closure of the General Electric Company Ohio

subsurface soil sampling in the vicinity of the storage unit in order to define the extent of contamination. contamination. additional soil sampling should be performed outside of the building to determine the extent of the Soil sampling and analyses previously performed indicated elevated methylene chloride, pH and mercury levels in the soils. Through correspondence with the OEPA, it has been determined that Therefore the closure plan modifications included herein address the plan for

beyond the date of the approval of this revised plan. day extension to October 1, 1990. At this time an extension is requested for an additional 180 days closure. In the Killam correspondence to the OEPA in June 1990, a request was made for a 90-In addition to the modifications included herein, an extension is requested on the time allowed for



August 29, 1990 Page Two

If you have any questions regarding the above information or the attached plan, please contact me at your earliest convenience.

Very truly yours,

Rick A. Myers
Senior Project Engineer

RAM:PRZ/0003

M. Bergman - OEPA H. Russell - GE (Ohio Lamp) D. Grube - GE (Nela Park)

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T0: FILE

FROM: MYERS

DATE: NOVEMBER ယ 1992

SUBJECT: GENERAL ELECTRIC OHIO EPA MEETING - OHIO AUGUST LAMP

19, 1992

Warren, Closure meeting was ij attendance: Plan Ohio. for held The the ရှ meeting hazardous waste storage August 19, SPM called 1992 of ç General Electric, discuss unit at Ohio Lamp. approval Ohio of Lamp Plant, The following the Amended

PPopotnik LaFavre Russell Newell Correia $\mathbf{I} = \mathbf{I} - \mathbf{I} - \mathbf{I} - \mathbf{I}$ General Electric, General Electric, General Electric, Ohio EPA - NEDO Ohio EPA - NEDO Killam Associates Electric, Electric, Electric, A - NEDO A - NEDO Nela Ohio Ohio Lamp Park Lamp

Pertinent items of discussion included the following:

Myers

- Regarding the su... ohtain background samples outside beneath the drains, the firs **~**+ step S to
- , the the the background soils beneath d samples the drain drain, result then in the unit аn action t is clo closed level above the level ≓:
- 'n be Ŧ conducted the action to level is determine the below extent of the level contamination ij the soils, then sampling must
- 4. Provide should be e at soil description of background interface (e.g. clay/slag). sample borings Deepes sample
- \mathcal{O}_{1} Provide with high highest TCLP total analysis mercury instead of level. Ε̈́Þ analysis and perform only 9 sample

Page 2

- 6. After discussion, the group observed the hazardous noting the drain locations. waste storage unit,
- 7. Outside, Ohio EPA representatives noted the site configuration (fence, railroad right-of-way) and identified acceptable locations for four background borings, with samples at three depths (total 12 samples). Sample locations were six and 16 feet west of west drain and east of east drain.
- $^{\circ}$ Ohio EPA representatives indicated forthcoming. that an amended plan approval would be

RAM: t1k/5086B

Chamis Connen Frank Popotnik Etrienne (a Faire RICK Myers HOWARD & Russell

GE LIGHTING CLEVERAND CHIOLAMPPLANT OEPA Killem Associales

(216) 373/400 22/ 216 266-2370

(216) 963-1250 (216) 963-1198

SIRH



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr. Columbus, Ohlo 43266-0149 (614) 644-3020 FAX (614) 644-2329

George V. Voinovich

AMENDED CLOSURE PLAN APPROVAL

September 25, 1992

CERTIFIED MAII

AMENDED CLOSURE PLAN GENERAL ELECTRIC COMPANY OHIO_LAMP_PLANT OHD 066 052 804 02-78-0153

RE:

Mr. Howard Russell General Electric Company Ohio Lamp Plant 1210 North Park Ave. Warren, Ohio 44483

Dear Mr. Russell:

plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that General Electric Company - Ohio Lamp Plant's proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12. located at submitted September t o 1210 North Ohio 10, EPA an amended closure plan for 1990, Park Ave., nu General Electric Warren, Ohio. The Original Property of Rule 3745-66-12 Company a drum storage amended closure Ohio Lamp area

received by Ohio EPA in regarding the amended closure plan of General Electric Company Lamp Plant in accordance with OAC Rule 3745-66-12. No comment was given this matter. the ö comments comments Ohio were

herein, meets submittal, I co Based complies nogn review conclude with y at 1210 North Park Ave., Warren, Ohio, as the performance standard contained in OAC Rule 37 the performance standard contained in OAC Rule 3745-66-12. Ó H that the General Electric Company Ohio the hazardous Lamp 3745-66 modified Plant's

I certify this to be a true and accurate copy of the official document as fied in the recerds of the Ohio Environmental Protection Agency.

By: Mary Carry Date 9-25-92

Uhio Environmental Protection Agency ENTEREU DIRECTOR'S JOURNAL

SEP 25 1992

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Mr. Howard Russell General Electric Company Page Two

General Electric Company following The amended closure plan submitted to Ohio modifications: Ohio Lamp Plant is hereby approved with the EPA on September 10, 1990

- in OAC 3745 followings, found in OA qualified, drawings, for documentation; activities methods; closed in place; after Ohio EPA reference to the approved plan; engineer must cert. in OAC 3745-50-42. owner/operator f) laboratory records; OAC 3745-50-42(D); b) the approved closure plan or to the approved plan; c) the volume of waste removed or place; d) all correspondence regarding closure activity o EPA approval; e) details of sampling and analysis for independent, burrnp certify closure using signature requirements landfill clo and j) and The certification registered, the signature closures; independent ۳ 9 jost-closure
 of owner/operator details, professional engineer. ល document narrative describing registered post-closure including must professional include and clean-up as-built found
- <u>در</u> samples presented Electric samples. Amended Closure and manipulating data. Company -Twelve 1 Closure background Ohio Lamp P Plan proposes und samples are requi np Plant must adhere to Plan Review Guidance collecting required. SÍX for the (6) guidelines collecting background

soil/slag interface. reach sample and a highest concentration Background samples will be taken 6 and 2, and 6 and 16 feet east of sample depths must be collected with the concentration. TCLP Total mercury levels must CLP analysis done on the 16 feet west of sample area 1. Samples at t deepest sampling at the be determined sample with the three area for the

- ۳ areas Rlectric - Ohio Lamp plan for determining contamination the S CI results of past potentially contaminated for both sampling Plant will submit a detailed the full horizontal and vert est sampling are Plant will submi areas. above Ohio background, General vertical EPA considers soil sampling extent both
- TCLP analysis will replace F) Tox mercury analysis

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: mary Carrie Date 9-25-92

Obio Environmental Protection Agency Extend director's Journal

SEP 25 1992

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Mr. Howard Russell General Electric Company Page Three

regardless Amendments release General responsibilities be waste advised of the time at which 0 1984 OH 9 that Electric constituents regarding required approval Company corrective under waste from any solid waste of this amended closure the was placed Ohio action for Hazardous dur in the unit. and management unit, Plant all Plan Solid from Waste any pot o f

contamination or to protect eppropriate Revised substances Director may, on the basis of any information that there is or has a release of hazardous waste, hazardous constituents, or hazar Notwithstanding compliance Code necessary; into seq of legal requiring the environment, issue the Revised ü 0 equitable initiate corrective public with the terms Code or Chapters appropriate health or safety or the action or remedies an order of the closure plan; the ct O der pursuant to ers 3734 or 6111 such other resp action; OF pollution or environment response seek hazardous Section been Any the 8 9

U.S.A. \$9601 et seq., as amended by the Superfund Amendments Reauthorization Act of 1986, Pub. L. 99-499 ("CERCLA") or to take other action pursuant to applicable Federal or State law, including not limited to the right to issue a permit with terms and conditing requiring corrective action pursuant to Chapters 3734 or 6111 of Revised Code; the right to seek injunctive relief, monetary penalt and punitive damages, to undertake any ren response action relating to the facility, and costs incurred by the Director in undertaking Environmental beyond Nothing the \$9601 here terms shall Response, O. waive the closure plan pursuant to the Comprehensive Compensation and Liability Act of 1980, 42 the seek injunctive relief, monetary penalties right 199-499 ("Carrind 0 Hi the and to seek recovery for removal, Director such actions remedial ςţ take conditions 1980, and/or action any Aup and

Review at A copy of the appeal must be served on the Director (Environmental Protection Agency within three (3) days of the Board. An appeal may be filed with the Environment Review within thirty (30) days after notice of A copy of the appeal must be served on the appeal Set 3745.04 of appealed forth the ac Town notified Street, Room the the Ohio Revised Code. the n appeal may be fi following address: that this action of Environmental 11 must 300, Columbus, ьe ned of and the filed with the on of the director is Board of Review pure of. Environmental The appeal Ohio 43266-0557. grounds upon Environmental the Director's action. must Environmental Board pursuant D O final and may OH: in writing and of Review, filing with tt which Board Board Section Ohio the O Ha

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

Date 9-25-92-Ohio Environmental Protection Agency WHOOL SUCCESSIO CHELYS

SEP 25 1992

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Page Four General Electric Company Howard Russell

independent, r been closed i certification found in OAC 3 1049, certification by the owner or operator shall include the statement found in OAC 3745-50-42(D). These certifications should be submitted to: Ohio-Environmental Protection-Agency, Division of Hazardous-Waste Management, Attn: Thomas Crepeau, Data Management Section, P.O. Box requires the When closure the Columbus, Ohio Ohio owner or operator of a facility to submit is completed, registered professional in accordance certification 43266-0149. the Ohio Administrative Code Rule 3745-66-15 with the the engineer approved owner that the closure 9 operator to the Director the sta facility and has The an

Sincergly,

Bonald R. Schregardus Director Onto EPA oamne

DRS/ /fwn

00: Tom Crepeau, DHWM, CO, Ohio EPA Randy Meyer, DHWM, CO, Ohio EPA Acting Section Chief, Ohio Permit Adrienne LaFavre, DHWM, NEDO, Ohio Frank Popotnik, DHWM, DHWM, NEDO, Ohio EPA Section, U.S. Region

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

many Date 9-25-92

Unio Environmental Protection Agency HIND CHOLENIO CHALL

SEP ' 25 1992

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EXHIBIT B

WASTEWATER DISCHARGE APPROVAL



CITY OF WARREN, OHIO

DANIEL J. SFERRA, Mayor

HENRY J. ANGELO,
Director of Service-Safety
CITY HALL
391 Mahoning Avenue N.W.
Telephone: 841-2601

JOHN D. MORLEY, DIRECTOR Water Pollution Control Center 2323 Main Avenue, S.W. Warren, Ohio 44481 Telephone: 841-2591

March 15, 1990

0051 6 T MWI

Mr. A. Brad Richardson Killam Associates 6465 Reflections Drive Suite 100 Dublin, Ohio 43017-2353

Re: 1) General Electric Ohio Lamp Facility
Killam Project Number 2G018.11
2) General Electric Trumbull Facility

2) General Electric Trumbull Facility Killam Project Number 2G018.08

Dear Mr. Richardson:

used sanitary and not letter moderate release Warren. of have cleaning concrete March 13, 1990, Care should be exercised that the discharge is directed to a reviewed to any to the sanitary sewer, storm sewer system. the pads. regarding the analytical data that We feel that a release of wash and rinse water will be acceptable of wash staggered discharge, at staggered to the City you supplied with your

information 841-2591. Should there regarding Ъе any this questions matter, please contact Mr. Robert concerning sewer systems or other Barker at

Sincerely,

Paul E. Truax
Superintendent
Vator Pollution Con

Water Pollution Control Center

PET:ckk

6465 Reflections Drive, DLA Division

Suite 100. Telephone: 614-793-0992 Fax: 614-793-0995 Dublin, OH 43017-2353

March 1990

2323 Main Pollution Avenue S.W. Cont rol Departmen

Warren, Mr. Ohio Paul 44481 Truax

subject: 1 General Killam Electric Number 2G018.11 Ohio Lamp Facility

General Killam Project Number Project Nu l Electric Trumbull 2G018.08 Facility

Truax,

Trumbull Facility, were storage one at rinse industrial Industrial water General units for used О Н pre-treatment criteria Waste in cleaning Electric Ohio General , were used sealed 55 g Pre-treatment Electric das "interim stat concrete Lamp ¥ O te pads. Facility Coordinator, refer the release contacted status" and These hazardous another at Robert concrete regarding 0 fi wash Barker, pads, waste the and the

Enclo: enclosure taken by a a third facilities only the nclosed Ω R. party. s a list licensed Wash seek your Rinse of the test analysis paying professional engineer from General Electric's Ohion approval to discharge in the maters highlighted of the test professional General Ohic parameters from Killam into your H. Lamp yellow and sewer of samples Associates, Trumbull samples system

Both the wrespective stored in know.DWEI system facilities drums, if y wash rathe and rins than you <u>1</u>11 55 gallen want to s releasing 25.00 t (I) are stagger it all a being drums ρ († the stored once, Since discharge on-site please the water Tet 0 the the . ה.

yeur you earlie have ď any Q onvenience questions please contact me 9 Лое Morehart α H

Sinderely

Richardson

Brad

ABR/ph

Enclosure

O Killam File Projec \leftarrow ŀтj P 2G018 11/2G018 .08

Donal Grube

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Reactivity (HCM)	mg/kg	250	4,02		4,02									
(1125)	mg/8	500	16	19	10									
EP TOX Melcury	M9/2	,002	NA	NA	NA									
Total Melaury Methanol	M3/P		.071	,0015	.0051									
Methanol	mg/R		ND	ND .	ND		 							
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* other organics found, see

Extension Applied for (1808) Janyo

GENERAL ELECTRIC COMPANY

OHIO LAMP PLANT

WARREN, OHIO

RCRA CLOSURE PLAN

EPA I. D. NO. OHD 066 052 804

SEPTEMBER, 1988

(Revised FEBRUARY, 1989)

DUNCAN, LAGNESE AND ASSOCIATES, INC.
A DIVISION OF KILLAM ASSOCIATES
3185 Babcock Boulevard
Pittsburgh, Pennsylvania 15237
412/931-8400

GENERAL ELECTRIC COMPANY OHIO LAMP PLANT

RCRA CLOSURE PLAN

I. DESCRIPTION OF FACILITY

A. Owner/Operator Identification

General Electric Company Ohio Lamp Plant 1210 N. Park Avenue Warren, OH 44483

Telephone: 216/373-1400 Contact: Howard Russell

₽ acility EPA Identification Number: OHD 066 052 804

C. Facility Description

The this facility. incandescent lamps. Ohio Lamp Plant Approximately 800 people ŠĖ engaged ٦. ت the are production employed 약 at

II. DESCRIPTION OF MANAGEMENT UNIT TO BE CLOSED

A. Drum Storage Unit

generated on site and consists of Permit containers. 1980's. The "interim status" Application, Hazarous a container storage Form 3, were wastes hazardous stored Page 1, stored unit waste only ੜ within Line 1) at storage use 'n closed this from unit unit the the 55-gallon (Part A plant early were

plant (Figure 1). The concrete floor sloping inwards away from all points of egress storage unit The is unit consists located in the northwest corner of the 앜 792 square feet of

design, drains Figure 2. No piping is empty directly outside the wall along the northern side of the building. 8 small 12-inch drains and the reasoning for their installation is not known. were constructed along the railroad tracks associated with these S (vents) part of the original building are located at the base of drains. as shown in The drains

B. Wastes

Waste dichloromethane (methylene chloride) from paint and machine cleaning Waste petroleum oil Waste methyl alcohol	Flammable liquid/ n-propyl acetate, alcohol mixture	rags and bottles in water and/or vermiculite with Mercury	Waste darsol from parts and machine cleaning	Waste Name
				EPA Id
F002 D001 D001, D003, U154	D001, F003	D001, U151	F002	EPA Identification Code(s)

III. FACILITY MAP

- ? The Reston, Virginia Ohio--Trumbull County Ohio L amp Plant 22092 (Figure 3). issued is located δ on S. Geological the Warren Quadrangle, Survey,
- Latitude 41 degrees, 14 minutes, 51 seconds (N)
- Longitude -84 degrees, 47 minutes, 11 seconds (W)

₿. The (Figure 3). Oh io Lamp Plant is located at 1210 z Park Avenue

IV. FACILITY DRAWINGS

A drawing of the drum storage unit is given in Figure 2.

V. HAZARDOUS WASTE IDENTIFICATION

on site: The following types and quantities of hazardous wastes were stored

(methylene chloride) from paint and machine cleaning Waste petroleum oil Waste methyl alcohol	n-propyl acetate, alcohol mixture	rags and bottles in water and/or vermiculite w/Mercury	Waste darsol from parts and machine cleaning	Waste Name
F002 D001 D001, D003, U154	D001	ry D001, U151	F002	EPA Identification Code(s)
-1 4 5	4	26	4	Maximum Inventory (Drums)

VI. SCHEDULE FOR CLOSURE

6.		4.				
Certification of Closure	Disposal of Residual Waste	Soil Sampling	Decontamination/Rinse	Mobilization	Removal of Inventory	Activity
15 - 180		15 - 90	1	ı	0 - 30	Number of Days Following Closure Plan Approval

NOTE: Α'n engineer will be present during all sampling events. certify closure upon completion independent, registered, of closure professional activities. engineer The

VII. AIR EMISSIONS

closure activities employed within the confines of the building. Control Region. Air emissions any significant adverse impact on either attainment or maintenance ambient closure contingencies resultant from the high-pressure washing process of the drum storage unit. air quality standards are will generate made for minimizing air emissions related to will consist primarily of air emissions which would have within the Ambient Air Quality It is not anticipated water being

VIII. PERSONNEL SAFETY AND FIRE PREVENTION

A site-specific, experienced hazardous waste contractor licensed All closure attached in the appendix. and decontamination activities will be detailed personnel health and for work in Ohio. performed by safety plan is an

IX. DECONTAMINATION PROCEDURES

with pad. will inspect and evaluate the condition of the the pad to the underlying soil. concrete. an epoxy sealant if to Cracks decontamination This and crevices will be noted and temporarily will prevent the migration of rinse water through they of. facility extend through surfaces, General Electric the concrete depth 약 plugged storage

Decontamination of facility surfaces accomplished ρ high-pressure washing with a water-based (walls and floors) wi]] solution bе

being washed. Once applied to floor surfaces Application of the wash solution will to permit removal of contaminants in high traffic areas. 3,000 psi depending on the structural integrity of the surface collected and handled in the same manner the removal of residual wash solution. Rinse solutions will be to the floor following the removal of all dusts and dirt trisodium containing 55-gallon drums. with a solution will solution will phosphate approximately broom and the plugging be allowed to soak for a minimum of 30 minutes detergent. then be collected via vacuum and transferred Application of two rinses will be to 3 percent The wash solution will be applied vary between 1,500 and of the 12-inch as concentration the preceding in the Residual area, done drains. in the 숙

samples will Following parameters: the be completion collected of the and analyzed second rinse, for the representative following

pH Methanol N-propyl acetate Ignitability Methylene chloride Reactivity Total Mercury EP Tox Mercury	Parameter
9040 8010 8250 1010 8010 7.3.3.2, 7.3.4.2 7470 1310	Test Method
>2<12 s.u. 1 mg/1 1 mg/1 >1400F 1 mg/1 Not Reactive 0.002 mg/1 0.002 mg/1	Clean Level

40 CFR 141.50 contaminants, OAC 3745-81-12 will continue until levels of Facility decontamination and collection and will be hazardous levels in regulations Rinseate disposed as appropriate. containing constituent levels above these limits of 9 accordance with OAC 3745-81-11 for inorganic as analytical detection limits a hazardous for organic each parameter are Clean levels waste. analysis of samples established through contaminants, Rinseate found below are wi | | listed

decontamination operations. disposed at a 100 permitted gal lons 약, hazardous rinse water waste Will disposal be generated during facility.

yet and also provide evidence of storage unit, laboratory contracted to perform the analytical work. been contracted for the analytical work. to the time delays between closure closure the actual plan and General Electric will notify the closure of the storage unit, prior to the commencement of closure of a QA/QC program for the chosen plan, submittal, a laboratory has After 0EPA approval as G. E. will laboratory approval, to the the

X. CLEAN LEVELS FOR SOILS

Methods for Evaluating Solid Waste, Physical/Chemical Methods." methods will parameter are found parameters specified in Section XI below. Soils in the area will northern considered contaminated if the side of the unit, soils located adjacent to sampled to determine the extent of any hazardous materials Samples will be collected and presence of be those above the found the in the listed two small drains located concentrations of the clean U.S. levels. analyzed EPA's SW-846, "Test these Analytical for specified drains on the

×I. SAMPLING PLAN AND ANALYTICAL METHODS FOR SOIL SAMPLING

will with sample collection methods depths: 0-6 inches, 12-18 inches, and 24-30 inches. Three be soil samples will be collected beneath ₩:]] storage collected by an experienced field technician in accordance Ďе unit. used to obtain each sample, Samples described in wi]] be and the samples will be ΕPΑ each drain at collected SW-846. The samples at three

collected in clean sample bottles. all of the samples will be analyzed for the following parameters: Following sampling activities,

EP Tox Mercury	pH Methanol N-propyl acetate Ignitability Methylene chloride Reactivity Total Mercury	Parameter
1310	9045 8010 8025 1010 8010 7.3.3.2, 7.3.4.2 7471	Test Method
0.002 mg/l	>2<12 s.u. Analytical Detection Limit Analytical Detection Limit >1400F Analytical Detection Limit Not Reactive 0.002 mg/1	Clean Level

determined to be clean based upon the clean levels listed above. Analytical additional analysis methods used will will be performed be those if these samples found in EPA SW-846. N_O

same migration of any contamination. Samples will be collected at the 댴 reflecting additional soil removal activities. approximately four feet from the found, three continue samples found below contaminated levels. the depths as the initial samples. on will be collected and analyzed. lower samples are determined to be contaminated, additional samples will be at site, one-foot intervals until the above-listed additional samples will be collected at two locations മ revised closure collected to original sampling If extensive contamination is schedule If contaminated Sample analysis determine the Will be horizontal soils are parameters will then location.

XII. REMOVAL EFFORTS FOR CONTAMINATED SOILS

excavated 20-cubic-yard storage container. The container will be maintained excavated contaminated soils the plant until all contaminated soils have been removed. with and disposed വ backhoe are as മ discovered, hazardous and transferred the waste. materials Soils directly to wi]] Will be be

disposed at a permitted hazardous waste following excavation activities. container will be covered to limit the collection of precipitation The excavated disposal facility. materials wi 11

accordance with Section XIV below. borrow excavation will Following area. excavation Decontamination of be backfilled and removal using excavation equipment will be in 숙 clean contaminated soils from soils, Ы local the

XIII. LANDFILL CLOSURE PROCEDURES

been conducted at this site. to Not applicable. closure of Closure drum storage unit. activities described Landfill activities herein are have not related

XIV. EQUIPMENT DECONTAMINATION

therefore, (high-pressure washing with water). procedures activities Equipment utilized zone. appropriate manner prior to removal from the decontamination will be disposed will utilized either be in or to contaminated determined or decontaminated decontaminate Equipment will then Sp to bе result facility expendable Ş 약 be the surfaces closure rinsed

XV. CERTIFICATION

professional completion execute the enclosed certification. Upon implementation of the closure of. engineer, the closure the plan by responsible plan an and independent, corporate certification officer registered 약 the

XVI. FACILITY STATUS FOLLOWING CLOSURE

Following മ less than 90-day accumulation facility. closure of the drum storage unit, the unit will operate

XVII. CLOSURE REGULATIONS

to: This and OAC 3745-66. closure plan has been developed in accordance with Copies of this closure plan have been 40 CFR forwarded 265

Mr. Thomas Crepeau (3 copies)
Ohio Environmental Protection Agency
Division of Solid and Hazardous Waste Management
P. O. Box 1049
Columbus, OH 43622-0149

Mr. Mark Bergman (1 copy)
Ohio Environmental Protection Agency
Division of Solid and Hazardous Waste Management
2110 E. Aurora Road
Twinsburg, OH 44087

Ms. Lisa Pierard (1 copy)
Chief, Waste Management Division
Technical Program Section, Ohio Unit
United States Environmental Protection Agency
Region V
14th Floor
230 S. Dearborn Street
Chicago, IL 60604

s an 00061

CERTIFICATION

CERTIFICATION

with a system designed to assure that qualified personnel properly gather to the best of my knowledge and belief, true, accurate, and complete. person or persons who and evaluate the attachments were prepared under my direction or supervision in accordance responsible for gathering the information, the information submitted is, certify under information penalty of manage submitted. the system or those persons directly law that this document Based on my inquiry of the and

knowing violations. information including aware that there are significant penalties for submitting false the possibility of fine and imprisonment

GENERAL ELECTRIC COMPANY

P. T. Machuga, Plant Manager Ohio Lamp Plant

)ate

FIGURES

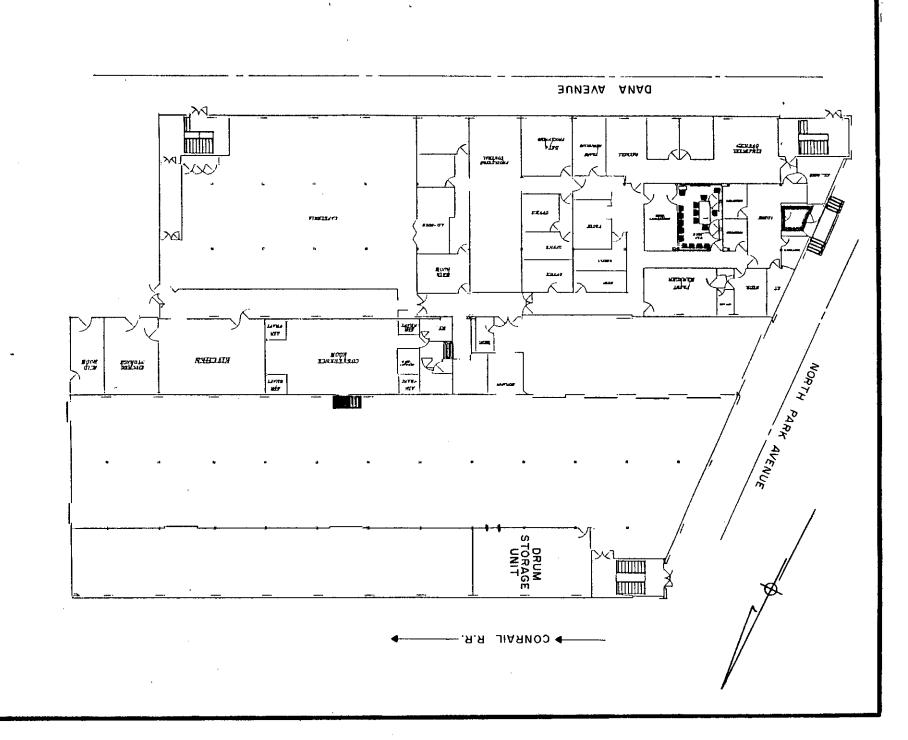
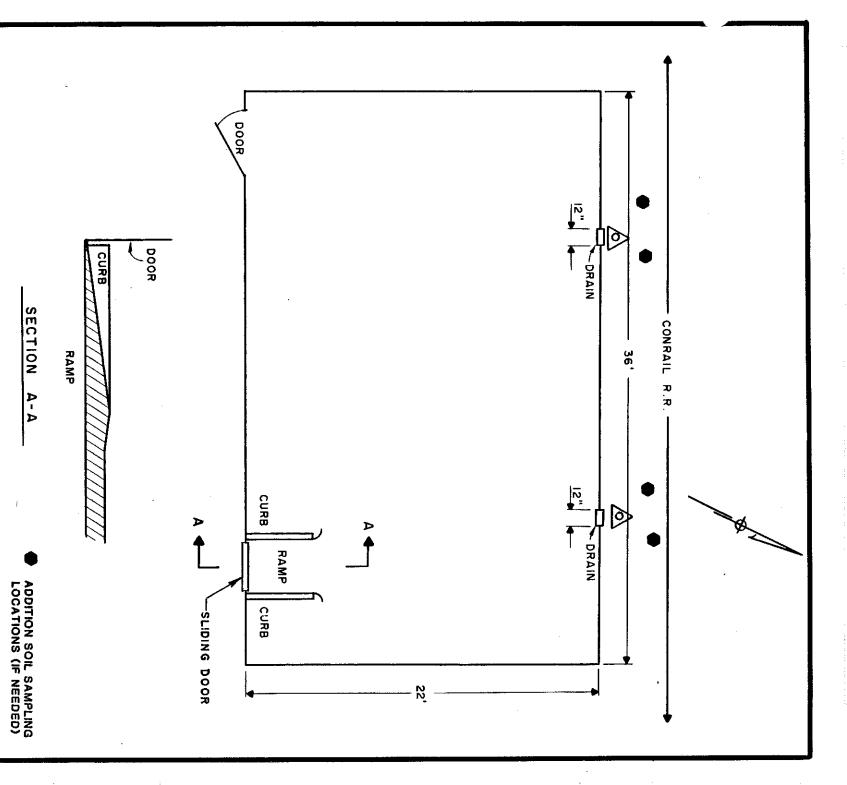


FIGURE 1
GENERAL ELECTRIC
DRUM STORAGE UNIT
OHIO LAMP PLANT
WARREN, OHIO
SCALE 1"=30"

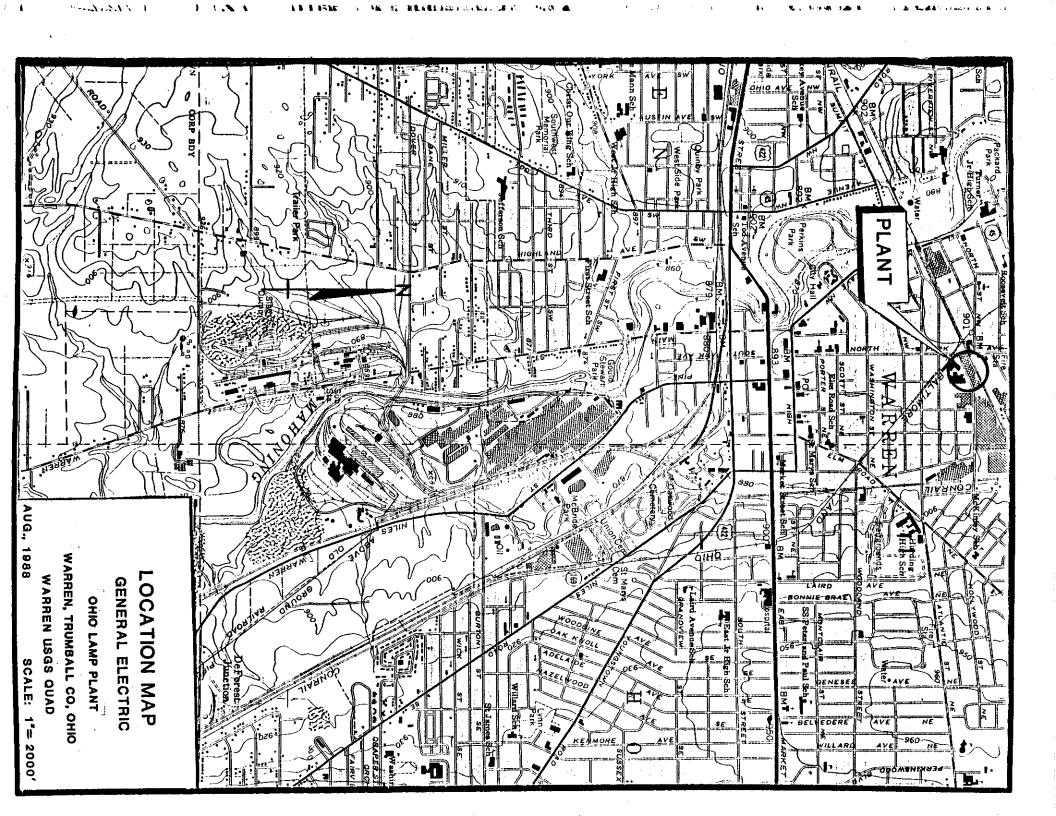


GENERAL ELECTRIC DRUM STORAGE UNIT

OHIO LAMP PLANT WARREN, OHIO

SCALE 1"= 6"

SOIL SAMPLING LOCATION



APPENDIX

SITE SAFETY PLAN

SITE SAFETY PLAN

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GENERAL INFORMATION		Ξ.	
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BACKGROUND REVIEW: Complete Preliminary X DOCUMENTATION/SUMMARY:

FACILITY DESCRIPTION:

quantities of industrial solvents and waste products. bulbs. The drum storage units were used for storage of small The facility is engaged in the enameling and coating of glass

B. SITE/WASTE CHARACTERISTICS

WASTE TYPE(S):

Liquid

×

Solid

×

Sludge X

			CHARACTERISTIC(S): Corrosive
Unknown	Toxic	Radioactive _	Corrosive _
	×		
Other (Name):	Reactive	Volatile	Ignitable X

STATUS: Active × Inactive Unknown

WASTES: N-propy1 acetate

Alcohol

Darsol

Methylene chloride

Petroleum oil

Methyl alcohol

CHEMICAL AND TOXICITY DATA:

N-propyl Acetate

PEL: 200 ppm

Absorption Routes: Inhalation, ingestion, and skin contact

Toxic Class: Vapor and liquid

Acute Symptoms: Eye, nose, and throat irritation, dermatitis, narcosis

Target Organs: Respiratory system, eyes, skin, central nervous system

Flash Point: 58°C

LEL: 2 percent

25 mm

٧P.

Incompatibilities: Oxidizers, alkalies, acids, and nitrates

Methylene Chloride

PEL: 500 ppm

Absorption Routes: Inhalation, ingestion, and skin contact

Toxic Class: Vapor or liquid

Acute Symptoms: Fatigue, numbness, nausea, eye and skin irritation

Target Organs: Cardiovascular damage, central nervous

system, skin, eyes

Flash Point:

LEL: 12 percent

₽: 350 mm

Incompatibilities: Strong oxidizers and caustics

Methyl Alcohol

200 ppm

Absorption Routes: Inhalation, ingestion, and skin contact

Toxic Class: Vapor and liquid

Acute Symptoms: Eye irritation, headache, drowsiness,

nausea, vomiting

Target Organs: Eyes, skin, central nervous system, gastrointestinal tract

Flash Point: 52.50F

LEL: 6.7 percent

97 mm

ΥÞ:

Incompatibilities: Strong oxidizers

\cdot HAZARD EVALUATION

materials will remain at the site prior to closure. Little or no safety hazard exits at the drum storage unit. ö waste

0 31 IS SAFETY WORK PLAN

PERIMETER ESTABLISHMENT:

MAP/SKETCH ATTACHED? Yes SITE SECURED? Yes

(See Closure Plan.)

PERSONNEL PROTECTION:

LEVEL OF PROTECTION: Þ \Box \bigcirc

MODIFICATIONS:

of drum storage units. respirators readily available) will be appropriate Modified Level D (wearing work clothes and Work for gloves with closure

SURVEILLANCE EQUIPMENT/MATERIALS: Photo ionization detector

ACTION LEVELS:

until organic vapor concentrations fall below 200 ppm. personal protective equipment. Work will continue decontamination personnel will be required to work with Level C excavation or organic vapor storage concentrations unit are (breathing above 200 ppm, zone) at Level C the

SPECIAL EQUIPMENT, FACILITIES, AND PROCEDURES: None

SITE ENTRY PROCEDURES: To be arranged with General Electric Company

Donald G. Olmstead (DLA)	Scott A. Nesbit (DLA)	James P. Hannan (DLA)	Team Member (Major)
Safety Officer	Project Engineer	Project Manager	Responsibility

WORK LIMITATIONS (time of day, etc.):

Work will be done during daylight hours.

CLOSURE-DERIVED MATERIAL DISPOSAL:

will consist of rinseate. The disposal facility. decontamination will be disposed at a permitted properly disposed. contaminated materials which may be generated during closure Any contaminated soils All rinseate generated will excavated during hazardous waste

E. EMERGENCY INFORMATION

Emergency Contacts

39	DLA	DLA	DLA
Plant Contact	Project Engineer	Project Manager	Safety Officer
Howard Russell	Scott A. Nesbit	James P. Hannan	Donald G. Olmstead
216/373-1400	412/931-8400	412/931-8400	412/931-8400

F. CONTINGENCY PLAN

spill, or other may occur during the closure operation. will be responsible for coordinating all emergency response measures health and the environment for objective 약 hazardous waste into the of the contingency plan is to minimize hazards to human emergency situation fires, air, explosions, or develops, the project engineer In the event soil, or surface water that that any unp lanned a fire,

Scott A. Nesbit of This person has the authority to out the contingency plan. DLA. commit The a | 1 project resources engineer necessary wi 1 1 be to

Implementation of Contingency Plan

the implementation of the contingency plan at the storage unit. authority In case of contingency following to an emergency situation, make plan. Depending on potential emergencies the decision concerning the implementation of the the safety officer degree might call of. seriousness, has

Fire within the plant will be made readily available. that - Due to the nature of the closure operation, fire will occur i. low. However, fire extinguishers the likelihood

unlikely that an explosion will occur. Explosion -Due to the nature of the closure operation, 1: is

occur during soil disturbance contaminated soils. Contamination , Potential air activities releases such are only likely SB excavation of

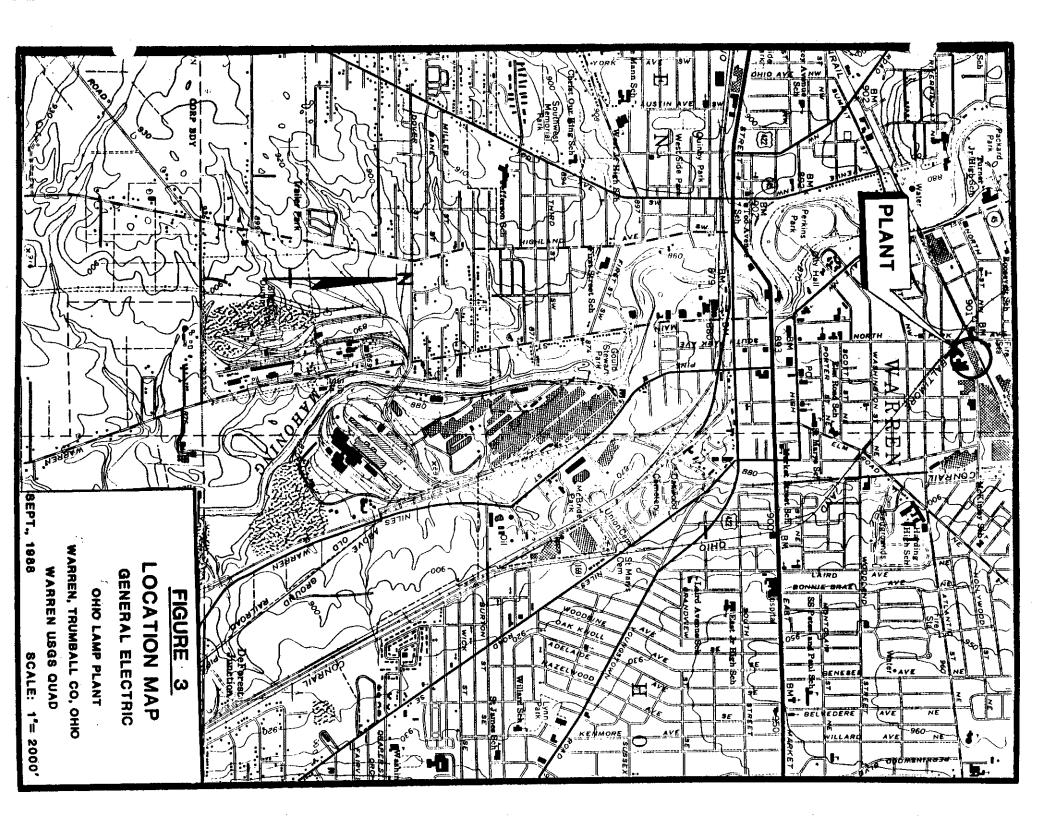
2. Emergency Response Procedures

below will be followed: event 약 ø non-acute emergency, the procedures

- Any employee situation must immediately contact the project engineer. discovering 9 causing Ф non-acute
- . personnel to respond to the emergency situation. project assess the engineer situation in conjunction with and contact the G. the E. personnel appropriate
- ç prevent its spread to the environment. take all necessary measures to contain the project engineer in conjunction with the hazard DLA team leader and
- ٩ protection equipment. emergency personnel and will include Safety measures will be taken to ensure maximum protection the esu of appropriate
- æ Personnel project engineer determines that it is safe to resume work. area until non-emergency personnel will the hazard assemble has at been will the contained entrance be removed from the hazard gate until and controlled.
- have Following [] project all contaminated wastes been collected. engineer containment wi 1 1 and generated by assess control the of the situation to determine if the emergency emergency, personne l
- ÷ to full operational status by emergency personnel. ensure project that all on-site emergency engineer in conjunction with the G. equipment J. personnel restored

<u>-</u> The project engineer in conjunction with the G. E. personnel steps to prevent the recurrence of such an incident. will investigate the cause of the emergency and will take

SAN:mag/00251





DLA Division

Thorn Hill Industrial Park 100 Allegheny Drive Warrendale, PA 15086-7565 Telephone: 412-772-0200 Fax: 412-772-1955

copy:

T. Harlan-GE H. Russell-GE

L. Pierard-USEPA (certified)

A. LaFavre-OEPA/NEDO

CERTIFIED MAIL P 362 723 253 RETURN RECEIPT REQUESTED

May 17, 1993

Mr. Thomas Crepeau
Ohio Environmental Protection Agency
Division of Solid and Hazardous Waste Management
PO BOX 1049
Columbus, Ohio 43266-0149



OHD 066 052 804 GENERAL ELECTRIC COMPANY - OHIO LAMP PLANT

KILLAM PROJECT NO. 2G045

Dear Mr. Crepeau:

storage unit have been met. certification and this addendum, all the OEPA requirements for the closure of this RCRA appropriate addendum has been signed by an independent, registered professional engineer and by the RCRA storage unit located in Warren, Ohio. This addendum is submitted to supplement the Attached is Addendum A Certification of Closure (three copies) for the Ohio Lamp plant Certification of Closure that was sent to you with our letter dated November 19, 1992. The General Electric Corporate Officer. With the submission of the closure

Very truly yours,

Rick A. Myers, P.E. Project Manager

RAM:PRZ/1017

Attachments

GENERAL ELECTRIC COMPANY WARREN, OHIO

OHIO LAMP PLANT

ADDENDUM A CERTIFICATION OF CLOSURE DRUM STORAGE FACILITY

EPA I.D. NO. OHD 066 052 804

KILLAM PROJECT NO. 2G045

MAY 1993

PREPARED BY:

KILLAM ASSOCIATES, DLA DIVISION 100 Allegheny Drive Warrendale, Pennsylvania 15086 (412) 772-0200

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I.	INTRODUCTION	1
Ш.	CLOSURE ACTIVITIES	2
III.	ENGINEER'S CERTIFICATION	4

OWNER/OPERATOR CERTIFICATION

FIGURE 1

TABLE 1

EXHIBITS

I. INTRODUCTION

agreement was formalized in an expressed concern with portions of the September 25, 1989 Administrative Code OAC 3745-66-15 submitted as Addendum A to the previously submitted Certification of 1992 are December 10, 1992 meeting and the Ohio EPA letter dated December December 10, 1992 in an attempt to resolve these closure plan which was approved by Ohio EPA in a letter dated July 6, storage unit located at the Ohio Lamp Plant, Warren, waste management units. Regulations (CFR) Part 265.115 pertaining to Closure information on Electric The General Electric Company has recently completed closure of a drum Ohio and an amended plan, approved by Ohio EPA in a letter dated unit was The soil was removed to certify of General agreed EPA in correspondence included in Exhibit 1992. conducted in accordance with the mercury to remove five cubic yards of Electric and Ohio closure Þ Certification of Closure report was submitted waste of on April 8, A. The Ohio EPA letter dated November 19, 1992. Ohio EPA the unit generation and and Title closure documentation and a EPA ij following 1992. personnel was accordance closure of hazardous 40, Code of Federal dated December disposition. concerns. soil and provide Ohio. Closure of Minutes from General Electric information wi th held General the The

II. CLOSURE ACTIVITIES

A. Drum Storage Area

records that mercury or mercury-contaminated wastes were stored in In accordance with Item 1 of Ohio EPA's letter dated December 11, removed 1992, inspection records and the hazardous waste storage area. from the Ş plant permitted personnel. manifests hazardous There is for wastes stored in and waste 00 evidence storage area were ň those

which mercury that is removed is by a dry process (i.e. no solvents) and recycled and was not a waste. and there was no reason to all mercury is The only known use of mercury in the was known to be stored are not on the same side of the building as the hazardous storage area. collected and taken by a vendor for recycling. During maintenance store it there since it was ⊒. the hazardous plant is of these waste storage 'n vacuum pumps pumps, being

storage area is the source of the low levels of mercury found outdoor soils. Therefore, there is no reason to believe that the hazardous waste

B. Outside Soils

characterization prior The results are provided in Table 1. soils drum storage beneath the west drain on the northern outside wall of area, were sampled on ţ removal and February disposal. 2, Analytical 1992 for

Soils of soils in accordance with the December 11, 1992 letter from Ohio inches of the soil beneath the slag was also removed. EPA and the approved closure plan. April 8, ð beneath the west drain of the storage area were 1993 by Entech Inc. വ depth of approximately The contractor performed the removal three feet. A minimum of two The soils consisted of removed

purpose of this concrete structure is unknown, but it appears and The of the building wall and to a depth of three to four feet. and The shown in Figure 1. it may have been a window well or a containment structure to be a concrete slab was encountered at the five foot depth. excavated area extended approximately seven to eight feet east top of the wall was six to eight inches below surface seven to eight feet west of the west drain, three feet north extended to excavation plan view of an eight inch thick concrete wall was encountered. a depth of at least five foot. What is believed the concrete and the excavated area for

excavation was backfilled with washed gravel. removal, transportation and disposal is included in Exhibit B. transported to Wayne Disposal, s i x cubic yards Inc. of. material for landfill disposal. were Documentation removed and for The

activities as stated in Ohio EPA letter of December 11, 1992. removal of these soils necessary for closure of this unit have been completed. satisfies the requirements of Ohio Therefore, all EPA

III. ENGINEER'S CERTIFICATION

CFR This management units. 265.115 concerning certification of information is submitted in accordance with OAC 3745-66-15 closure of hazardous and 40 waste



Rick A. Myers, P.E

Name

Signature

Date

Ohio for the State of

E-53077 Professional Engineer License Number

Killam Associates, DLA Division
100 Allegheny Drive, Warrendale, PA 15086,
Business Address and Telephone Number 412/772-0200

OWNER/OPERATOR CERTIFICATION

CERTIFICATION

or persons who manage the and evaluate the information submitted. Based on my inquiry of the person with a system designed to assure that qualified personnel properly gather attachments were prepared under my direction or supervision in accordance knowledge and belief true, accurate, and complete. gathering the information, the information submitted is to the best of my I hereby certify under penalty of law that this document and all system or those persons directly responsible for

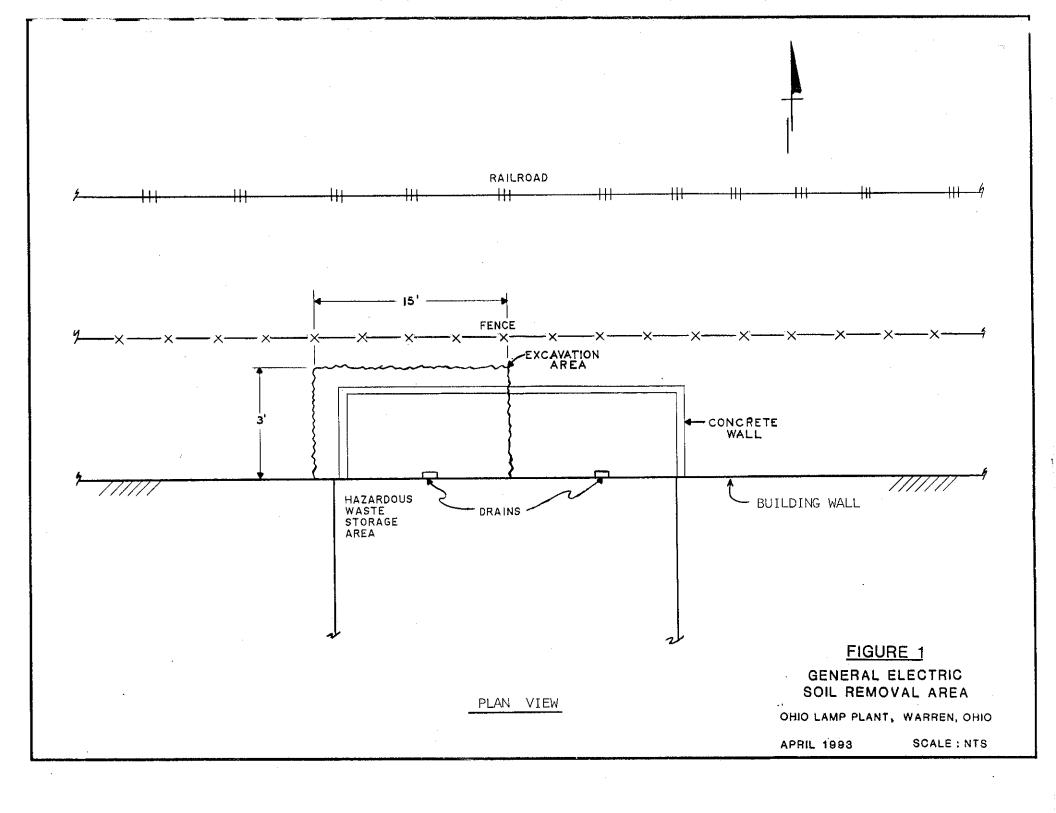
violations. information am aware that there are significant penalties including the possibility of fine and imprisonment for for submitting known

GENERAL ELECTRIC COMPANY

Thomas Gapinski //Plant Manager

Ohio Lamp Plant

Date



GENERAL ELECTRIC COMPANY OHIO LAMP PLANT SOIL ANALYSIS OF TCLP EXTRACT FEBRUARY 2, 1993 SAMPLE

TABLE

METHOXYCHLOR TOXAPHENE 2,4-D 2,4,5-TP SILVEX	CHLORDANE ENDRIN HEPTACHLOR LINDANE	HERBICIDES AND PESTICIDES	LEAD MERCURY SELENIUM SILVER	ARSENIC BARIUM CADMIUM CHROMIUM	METALS	
8080 8080 8150 8150	8080 0808 0808		7420 7470 7740 7760	7060 7080 7130 7190		SW846 ANALYSIS METHOD
0.0017 0.017 0.033 0.01	0.0017 0.00033 0.00023 0.00017		0.2 0.0004 0.022 0.02	0.002 0.1 0.02 0.05		METHOD DETECT. LIMIT
10.0 0.5 10.0 1.0	0.03 0.02 0.008 0.4		5.0 0.2 1.0	5.0 100.0 1.0 5.0		TIMIT
* ND ND	* * NU		<pre></pre>	0.003 0.9 < 0.02 0.08		SOIL

NOTE: ALL VALUES IN PARTS PER MILLION (mg/l)
ALL RESULTS REFLECT MATRIX BIAS CORRECTION,
* - NO MATRIX SPIKE ADJUSTMENT
** - 0% RECOVERY IN MATRIX SPIKE UNLESS NOTED

METALS ANALYSIS BY DLA LAB, H&P ANALYSIS BY CEIMIC CORP.

GENERAL ELECTRIC COMPANY
OHIO LAMP PLANT
SOIL
ANALYSIS OF TCLP EXTRACT
FEBRUARY 2, 1993 SAMPLE

TABLE 1

PYRIDINE 2,4,5-TRICHLOROPHENOL 2,4,6-TRICHLOROPHENOL	HEXACHLOROBENZENE HEXACHLOROBUTADIENE HEXACHLOROETHANE NITROBENZENE PENTACHLOROPHENOL	TOTAL CRESOLS 1,4-DICHLOROBENZENE 2,4-DINITROTOLUENE	1,1-DICHLOROETHENE METHYL ETHYL KETONE TETRACHLOROETHENE TRICHLOROETHENE VINYL CHLORIDE	BENZENE CARBON TETRACHLORIDE CHLOROBENZENE CHLOROFORM 1,2-DICHLOROETHANE	ORGANICS
8270 8270 8270	8270 8270 8270 8270 8270	8270 8270 8270	8240 8240 8240 8240 8240	8240 8240 8240 8240 8240 8240	SW846 METHOD ANALYSIS DETECT METHOD LIMIT
0.28 2.9 1.5	0.032 0.04 0.048 0.038 1.7	1.4 0.047 0.041	0.005 0.01 0.005 0.005 0.012	0.005 0.005 0.005 0.005	METHOD DETECT. LIMIT
5.0 400.0 2.0	0.13 0.5 3.0 2.0 100.0	200.0 7.5 0.13	0.7 200.0 0.7 0.5 0.2	0.5 0.5 100.0 6.0	TCLP
ND ND	NA N	UN UN	U U U U U	GN G	SOIL

NOTE: ALL VALUES IN PARTS PER MILLION (mg/1)
ALL RESULTS REFLECT MATRIX BIAS CORRECTION
ND - NOT DETECTED
LAB ANALYSIS BY CEIMIC CORPORATION, NARRAGANSETT, RI

SOIL GENERAL ELECTRIC COMPANY OHIO LAMP PLANT ANALYSIS OF TCLP FEBRUARY 2, 1993 EXTRACT SAMPLE

TABLE

IGNITABILITY (deg F) REACTIVITY-HCN (mg/kg) REACTIVITY-H2S (mg/kg) SOIL pH (S.U.) PETROLEUM HYDROCARBONS	
7.1 7.3.3.2 7.3.4.2 9040	SW846 METHOD ANALYSIS DETECT. METHOD LIMIT
10	METHOD IS DETECT. LIMIT
(1) 1 (2) 10 (2) (3) 33 (mg/kg)	
N.I. (1) (10) 8.9 128	SOIL

NOTES:

- TON
- 1. NOT 2. FOR NOT IGNITABLE IN ACCORDANCE WITH 40 CFR 261.21. FOR REACTIVITY, EPA ACTION LEVEL IS 250 MG REACTIAND 500 MG REACTIVE H2S/KG.
 THIS IS SOIL ph. CORROSIVITY IS ONLY FOR AQUEOUS MATERIAL OR LIQUIDS. CFR 261.21. 250 MG REACTIVE HCN/KG,
- **ن**ن

100 Lab analysis by DLA Lab, div. of Allegheny Drive, Warrendale, of Killam Associates le, PA 15086

EXHIBIT A

CORRESPONDENCE OHIO EPA AND GENERAL ELECTRIC



State of Ohio Environmental Protection Agency

Northeast District Office 2110 E. Aumra Road Tvinsburg, Ohio 44087-1969 6) 425-9171 ...x (216) 487-0769

> Gearge V. Vainovich Governor

December 11, 1992

GENERAL ELECTRIC LAMP PLANT TRUMBULL COUNTY OHD 066-052-804 02-78-0153

况区 *

COMPANY

Mr. Howard Russell Manufacturing and Environmental Engineering 1210 North Park Ave. Warren, Ohio 44483

Dear Mr. Russell:

mercury concentration data presented in the Certificate of Closure for the drum storage area, do not represent a normal statistical distribution. Rather than continued background sampling, we have agreed that General Electric Company may complete closure of the · brnqsurw. following. drum would storage like AS General ge unit E Ç discussed during our meeting, the background soil thank at the nov Ohio and your Lamp colleagues Plant Λď completing for coming

- mercury were demonstrate completeness, never stored in the search inspection wastes were that mercury ored in the permitted storage area. we would also like a description o generated and records contaminated hazardous and their description of how their disposition. manifests, wastes For
- Ņ these activities will take place. The slag and soil will undergo proper disposal and General Electric Company will provide the OEPA with all information regarding disposal. The area will be clean filled. soil will be removed from the area immediately adjacent the west vent. Please notify our office will be removed from the area immediately adjacent the west vent. The slag and soil will dates
- ţ eliminating the verarea presently bein accidental spills. are Closure Plan Review Guidance. generator closure storage support General Electric Company's plan to retrofit the enclosed. area. Retrofitting the area might either the vent nearest the hazardous waste being used, Please described on pages The storage area pass or protecting one Two copies сору onto Mr. 1s 17 and subject of this guidance the 18 vent Correa. o H t O storage PATOAUT from the

 $\overline{0}$

òı

JAN

Mr. Howard Russell December 11, 1992 Page -2-

Please call our office р С (216) 963-1250 with any question.

Sincerely,

Whithis has falled

Adrienne La Favre Environmental Specialist Divsion of Hazardous Waste Management

ALF/fwn

cc: Frank Popotnik, DHWM, NEDO Randy Meyer, DHWM, CO

U U N U



MEMORANDUM

:OT FILE

FROM: R. MYERS

Copy: Howard Russell-General Electric

Dennis Correia-General Electric

DATE: **DECEMBER 14, 1992**

SUBJECT: GENERAL ELECTRIC - OHIO LAMP PLANT OHIO EPA MEETING - DECEMBER 10, 1992

KILLAM PROJECT NO. 2G038.11

certification report for the General Electric Ohio Lamp facility. Those in attendance included: Thursday, December 10, 1992, to review Ohio EPA comments regarding the closure A meeting took place at Ohio EPA offices located in Twinsburg, Ohio, on

Dennis Correia General Electric-Nela Park

Howard Russell General Electric-Ohio Lamp

John Newill General Electric-Ohio Lamp

Adrienne LaFavre Ohio EPA

Frank Popotnik Ohio EPA

Rick Myers Killam Associates

indicates that the mercury is moving west from the storage room drains distributed. The standard deviation was A. LaFavre stated that the background data for mercury was not normally greater than two times the mean. The

along the railroad J. Newill stated that drainage in that area is to the east, away from the street

of the railroad and that the area frequently floods. H. Russell indicated that the drainage is on the south side (GE Building side)



1

deviation was 0.06 and the mean was 0.076 with a resultant action level of 0.20 A. LaFavre said that without the "high" background sample (#3), the standard

- avoided in choosing background. since Ohio EPA guidance indicates that both railroad rights-of-way and ditches should be R. Myers stated that these locations may not be appropriate for background
- the vendor. from vacuum pumps was removed in a "dry" process (i.e., no solvents) and it was taken by building and that it was not in the hazardous wastes that were stored in the room. Mercury Ö Correia stated that mercury was not used in the railroad side of the
- was stored in the hazardous waste storage room. A. LaFavre asked if there was documentation which showed that no mercury
- I Russell stated that he should have manifests back through 1983
- the west drain. Where was the storage area? F. Popotnik asked if it would be agreeable to remove 5 cubic yards around
- that floating flammables would go outside northwest corner of the flammables room. The drains were required by the fire marshal so Ξ Russell indicated that the hazardous waste storage area was in the
- any hazardous waste spills but still comply with fire marshal requirements D. Correia and H. Russell stated that they would look into curbing to contain
- ģ generator site, and curbing would help minimize future closure A. LaFavre indicated that the 90-day storage area would require closure as costs.

(down to clay). For clarification on the volume, R. Myers asked if depth was to be 3



1

A. LaFavre said to remove the top two inches of clay.

also indicated that further sampling is not required by Ohio EPA but may be required for disposal. F. Popotnik requested that Ohio EPA be notified prior to soil removal. Ήe

had no detectable mercury and there is no reason to believe the soil is hazardous R. Myers said that disposal would be as nonhazardous waste. TCLP leachate

procedures review during next inspection to verify that no mercury was present in the wastes. analysis/procedures. It was also requested that the manifests/records be available for her but that there A. LaFavre indicated that methylene chloride was likely due to the lab is no excuse for it. Lab must do a better job with

In summary, A. LaFavre stated that:

- 5 cubic yards of soil is to be removed around the west drain.
- io ∺ General Electric is to make available the manifests for Ohio EPA review.
- က A. LaFavre will write a letter summarizing agreement made in this meeting.

File/memo-196

EXHIBIT B

SOIL REMOVAL/SOIL DISPOSAL REPORT



April 13, 1993

Mr. Howard Russell General Electric Company Ohio Lamp Plant 1210 North Park Warren, Ohio 44483

RE: Soil Removal/Soil Disposal Report

Dear Mr. Russell:

The following paragraphs and enclosures highlights the work completed by ENTECH Management Services Company on April 8, 1993, at General Electric company's Lamp plant, located in Warren, Ohio.

be removed. As part of your RCRA Facility closure, Ohio EPA request that an area contaminated by trace levels of mercury be excavated. They had recommended (5) five yards of this soil

On March 8, 1993, ENTECH with guidance from Adriene LaFavre of Ohio EPA, Rick Myers of Killiam Associates, and yourself, Howard Russell of G.E., hand excavated the material which was removed was controlled by the previously mentioned officials onmaterial were manifested to Wayne Disposal, Inc. Please note the actual amount of material which was excavated. However, not all of them were full and (6) six yards of due to space constriction. There were (7) seven cubic yard bags used to store the material from the designated area. The soil was temporarily stored in cubic yard bags 0.7 ton per cubic yard. Based on the silty nature of the material this would make perfect 4.21 tons thus leading us to believe that the material weight approximately 1400 lbs. or The material as received by Wayne Disposal, Inc. was (6) six yards and equated to

The existing hole was then filled with #57 washed gravel from Warren Concrete Company. The gravel was plate tamped to assure minimal settling.

Please Note the following enclosures:

ENTECH daily work ticket

1008 MAIN STREET + BUFFALO, NEW YORK 14202 + (716) 881-9001 + FAX (716) 882-6496 DISTRICT OFFICE: ROBBINSVILLE, NEW JERSEY



- 2) Manifest from Wayne Disposal shipment3) Certificate of Disposal from Wayne Dispo Certificate of Disposal from Wayne Disposal Inc. Weight Ticket from Wayne Disposal

If you have any questions or further requirements, please feel free to contact me at (716) 881-9001 and thank you for allowing ENTECH this opportunity to quote on your waste management needs.

Very truly yours, ENTECH MANAGEMENT SERVICES

Senior Consultant Mark M. Baron

Enclosures MMB/mw

cc: Rick Myer, Killiam Associates (2 copies)

.06 OR

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DNR W	DO NOT WRITE IN THIS SPAC	m 	Failure to file is punishable under section 299,548 MCL or Section 10 of Act 135, PA 1969
IICHIGAN DEPARTMENT	DO NOT WRITE IN THIS SPACE)	
F NATURAL RESOURCES	ATT. DIS. REJ. PR. PR.	PR.	•
		Form Appr	Form Approved. OMB No. 2050-0039 Expires 9-30-94
1	4) A	7 0 2.1	Man fact 13 Bace 1 Information in the charlet areas
NIFORM HAZARDOUS	I Generator's US EPA ID No. Possiment No.	7 i afte i 7	. Is not required by Foderal
WASTE MANIFEST	O B D O 6 0 5 2 0 5 4 7 P DO / O' I law.	of L	law.

Required under authority of Act 64 1979, as amended and Act 136 PA

Please print ø P 11. US DOT Description (including ID) 3. Generator GENERAL i α HAYNE 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. BELLEVILLE, 49350 1210 MORTH Discrepancy Ind 15. Special Handling Instructions 11. FOR FSINE Designated Facility Name and transporter If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR; if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. Transporter Printed Typed Transporter grinted/Typed ransporte Printed/Typed A Additional Descriptions for Materials Listed Above 74 DISPOSAL, NON-REGULATED SOIL CYCKER BURNING WAR I-94 SERVICE PARK AVENUE Company Name Name Name MICHIGAN Acknowledgement APPROVAL CONTAMINATED INC wledgement Mailing Address
COMPANY WARKEN 216 λ 8 223 #32493WC DRIVE Proper Shipping NUMBER). Site Address 48111 ġ: U.S. WARREN, OHIO đ 373-1400 ヒコ Additional HIIM Receipt Receipt EPA MERCURY ₫ ಲ್ಲ EMERGENCY Information TAMP QR. Name, Materials Materials C M I D 0 4 8 0 5 PLANT 44483 Hazard CO 0 CONTACT DOT Signa Signature Class, **6-6** US EPA ID Number 1. φ G.E. 0|6|3 00 SECURITY 8 Containers 10 w Type D. Handling Cod Listed Above Transporter's Phone 246
State Transporter's ID State Generator's SAME Facility's Phone (313) 697-7830 State Manifest Document Number 3004203 State Facility's State Transporter's ID7 0000 216-266-2222 Total Quantity 6 ō ₫ MV/o 5 Wastes Month N 9 110 Month Day Month 0 Waste No. 151040133 \sim 9 9 Q а 20°5 22°5 Date Date Date Ś Day ţ-スニュ 72

×...

ALL SPILLS MIST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTICA SYSTEM, IN MICH. ... 11-801

3-424-8802 24 HOURS PER DAY.

#M-130702>3-

EPA Form Inted/Typed Name 8700-22 (Rev 9/88)

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CENTER A

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Facility Owner Item 19.

Operator.

Certification

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receipt

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materials

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WAYNE DISPOSAL, INC

ENVIRONMENTAL PROTECTION FACILITY • (313) 697-7830
49350 N. I-94 Service Drive
• FAX: (313) 699-3499
Belleville, Michigan 48111

CERTIFICATE OF DISPOSA

defined 6 10 local the have been specifie dispose

FACILITY NAME	WAYNE DISPOSAL THE
ADDRESS	49350 N, SERVICE DRIVE
	Belleville, Mr 48111
EPA I.D. NO.	M10048090633
PHONE NUMBER	(313) 697-7830

please Should you have a feel free any to contact questions additional information,

ery truly yours,

WAYNE DISPOSAL, INC.

Signed:

(Authorized Signature

CORPORATE OFFICES 1349 WHITTAKER ROAD, YPSILANTI, MICHIGAN 48197 (313) 485-6460 • FAX: (313) 485-6450

Ypsilanti () Lii ٦, < ΗΣ 1349 Michigan HUNDK Z 48197

(

3.

I-94 Landfill Offices 0929(818) (313)697-7830

WRITTEN BY. NON-HAZARDOUS YAG DATE WASTE 4/09/93

1

ACCT.

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EDMINOT

--· _

ACCOUNT NUMBER: 117浬 SHORT NAME: ENTECT

CODE SULFIN # 3E493-WC

QUANTITY:

Approval CHDO26052804

DENERAL. REMARKS: EFAH ELECTRIC

Manifest # MI BOO4SOB

11.00 Hauler 9 174,360 In 11:18 WT I PZ 010,010 Time **7** Dut 11.500 004-00 <u>₽</u>

I understand and acknowledge that entry is permitted only at my own risk. I, both personally and on behalf of my employer release Wayne Disposal, Inc. and/or Michigan Disposal, Inc. from any and all liability not caused by its gross negligence or willful misconduct.

t T

计算四大命令 # 1040133

DELIVERED BY

NO SALVAGING ON PREMISES



DLA Division

Warrendale, PA 15086-7565 Telephone: 412-772-0200 Fax: 412-772-1955 100 Allegheny Drive Thom Hill Industrial Park

copy: Correia Russell 99

LaFavre

Pierard OEPA/NEDO US EPA (Certified),

CERTIFIED MAIL P RTIFIED MAIL P 362 723 321 RETURN RECEIPT REQUESTED

November 19, 1992

Ohio Environmental Protection Agency Division of Solid and Hazardous Columbus, Ohio P 0 BOX 1049 Waste Management Thomas Crepeau 43266-0149



OHIO LAMP PLANT OHD 066 052 804 GENERAL ELECTRIC KILLAM PROJECT NO. COMPANY 2G038

Dear ₹ . Crepeau:

appropriate been signed plant Attached RCRA storage unit have been met RCRA is storage the certification of closure (three copies) for the Ohio L storage unit located in Warren, Ohio. The certification by an independent, registered professional engineer and by General Electric corporate officer. With the submission certification, a | | the OEPA requirements for the closure Ohio Lamp Spu the of of

Very truly yours,

Rick A. Myers, . Р. Е

RAM: t1k/5091B Attachments Project Manager

GENERAL ELECTRIC COMPANY WARREN, OHIO

OHIO LAMP PLANT

CERTIFICATION OF CLOSURE DRUM STORAGE FACILITY

EPA I.D. NO. OHD 066 052 804

KILLAM PROJECT NO. 2G038

NOVEMBER 1992

PREPARED BY:

KILLAM ASSOCIATES, DLA *DIVISION*100 Allegheny Drive
Warrendale, Pennsylvania 15086
(412) 772-0200

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II.

OWNER/OPERATOR CERTIFICATION

FIGURES

TABLES

EXHIBITS

. INTRODUCTION

approved by Ohio EPA in a letter dated July 6, 1989 and an amended drums containing waste materials storage unit located at the Ohio Lamp Plant, Warren, Ohio. Part 265.115 pertaining to closure of hazardous waste management units. Code OAC 3745-66-15 certify closure of the unit in accordance with Ohio Administrative included in Exhibit A. The following information is submitted to Correspondence between Ohio EPA and General Electric, Ohio Lamp, plan, approved by Ohio EPA in a letter dated September 25, 1992. petroleum oil, and Methyl Alcohol. hazardous waste management unit was used for the storage of 55-gallon (aluminum zirconium), The General Electric Company has recently completed closure of a drum accordance with the General Electric closure plan which was and Title 40, Code of Federal Regulations Alcohol/n-Propyl Acetate, waste Darsol, including methylene chloride, Closure of this unit was conducted

I. CLOSURE ACTIVITIES

A. Drum Storage Area

analytical testing are attached in Table 1. storage unit location is Corporation in accordance with the approved closure during collected collection and analysis of rinseate. All rinseate generated was unit surfaces, high-pressure rinsing of unit surfaces, prevent decontamination the two drains along the north wall were sealed to closure plan. decontamination of the unit in accordance with Decontamination of the storage unit was performed on December foot room with concrete floor and concrete block walls. Prior to decontamination was analyzed at leakage. materials and stored in 55-gallon drums. The unit by 7-7 Decontamination included the removal of (i.e., dirt, dust), high-pressure washing of consists of an approximate 22 foot by shown on Figures 1 and 2. Results of Inc. The contractor DLA Lab Rinsewater generated performed the approved and Ceimic plan. a]] and

May 9, 1990. (OAC during decontamination was sampled and found to be nonhazardous that the unit floor is clean. Rinseate and wash water generated second from the December 1989 cleaning. D concentr ons of the above parameters were below hazardous levels Decontamination organics analyses Following completion of the analytical testing, the results 3745-51). Mercury was found to be present in the rinseate set of were compared to the maximum concentrations allowable for mercury, Results of analysis included in Table 1 indicate decontamination activities as detailed of the units was pH, reactivity & M Services performed a performed until rinseate and ignitability. above on of.

system, after obtaining their approval (Exhibit B). wash water were discharged to the city of Warren's sanitary sewer indicated by drum sample analysis in Table 1. The rinseate

B. Outside Soils

soi l methylene chloride, and pH above the clean levels in the closure Table 2. acceptable limits. Additional soil samples were non-detectable to 1.3 mg/Kg and pH ranging from 8.3 to 10.1. accordance the drum samples presented in Table 2 indicate mercury levels ranging 0.22 mg/Kg to 2.1 mg/Kg, methylene chloride levels from parameters of concern were either non-detectable or within See Figure 2 for sample locations. 1990, the Results beneath the two drains on the northern outside storage area, were sampled on December 14, with the approved closure depths at analytical results again indicated the each location. of plan. Analytical results which are presence Soils were of mercury, presented obtained obtained for the on

modifications Plan Review Guidance basis EPA which included a provision for use of background samples as a September 1990 an amended closure plan was submitted Exhibit A). for an action level as by Ohio EPA in a letter dated September 25, 1992 manual. permitted in the The amended plan was approved with Ohio EPA Closure ţ

locations Background soils were obtained at the Ohio EPA approved locations descriptions August action (1, 2, 3, and 4) are shown on Figure 3. 20, 1992 and September 30, are provided in Table 3. level calculations for mercury Analytical results 1992. are Background presented sample along Soil

3.28 ppm (0.66 + 2 * 1.31 = 3.28).being 1.31 as mercury. detection limit) was assigned to those samples with no detectable definition: Action levels were The mean background was 0.66 ppm with standard deviation deviations. action shown in Table 4. Therefore the action level is calculated based on the level equals background A value of 0.006 ppm (one-half Ohio average plus EPA Guidance the 0.012

The mercury concentrations in the samples beneath the drains and less. from background samples and are, therefore, considered These levels are less than the action level

additional sampling and analysis (See letters in Exhibit A). laboratory analysis, but required that this be accepted as clean. behalf of extended time period, and methylene chloride is a chloride that the methylene chloride could be an artifact is highly volatile and would not remain in soils General Electric that the methylene chloride levels laboratory cleaning, which frequently chloride In a letter dated June 7, 1990, Killam requested levels in soils were suspect In a response dated August 6, 1990, Ohio appears common chemical since methylene confirmed with bе

and 6. action level of 36.3 ug/kg as calculated from background variability between split samples were obtained at the background locations on September 30, 1992, and sent to separate labs for analysis. In addition soil samples were Results SPM A review of the indicated in for these obtained analyses the background samples. results indicates on February 4, 1991, and August samples. are presented in In addition, a wide Based methylene range of Tables samples

soil samples at Ohio Lamp is not indicated by the September 30, 1992 analysis and/or is an artifact storage the opinion of Killam that the methylene chloride detected in the analysis as indicated in split soil sample analytical activities, but rather is in the background soils as 6) and the variability in split sample results, it is a result of hazardous waste

by the slightly elevated pH are minimal in 9.3. Therefore it is the opinion of Killam that the risks obtained on December 14, 1989, no samples had a pH level Samples taken at background locations (Table 4) were EPA indicated agreement with this in a letter dated August 6, 1990. tends to be near the upper pH limit of 9.0. Elevated acceptable limits, on l y slightly above the and indicated soil pH in the area Aside from one sample this 9.0 upper limit. instance. in the upper posed

not Therefore, based on background soil sample analyses and potential associated with hazardous interferences further action is required. chloride, and pH detected in initial soil samples (methylene chloride), the levels waste activities at the storage of mercury,

III. ENGINEER'S CERTIFICATION

and hazardous waste management units. This 40 information 265.115 is submitted concerning in accordance with OAC 3745-66-15 certification of closure of



Rick A. Myers, P.E

Name

Date

Signature

E-53077

Professional Engineer License Number

Ohio for the State of

Killam Associates, DLA Division
100 Allegheny Drive, Warrendale, PA 1
Business Address and Telephone Number PA 15086, 412/772-0200

OWNER/OPERATOR CERTIFICATON

CERTIFICATION

with a system designed to assure that qualified personnel properly gather responsible for gathering the information, person attachments were prepared under my direction or supervision in accordance to the best of my knowledge and belief true, accurate, and complete. I hereby certify under penalty of law that this document and all evaluate or persons the information who manage submitted. the system the information submitted is Based on my inquiry of the 약 those persons directly

information violations. am aware that there including the possibility of fine are significant penalties for submitting and imprisonment for false known

GENERAL ELECTRIC COMPANY

Thomas Gapinski Plant Manager

Ohio Lamp Plant

Date

DANA AVENUE Vro EDING TOMPAD 1000AU THE STATE OF # 00% VI F# שחע אדר FOOT SEENCE NOALH PARK AVENUE # 00H 07:24 KTALCEREEN ENAOT. Livne with ATTI HTY ► CONRAIL R.R.-

FIGURE 1
GENERAL ELECTRIC
DRUM STORAGE UNIT
OHIO LAMP PLANT
WARREN, OHIO

SCALE 1"=30'

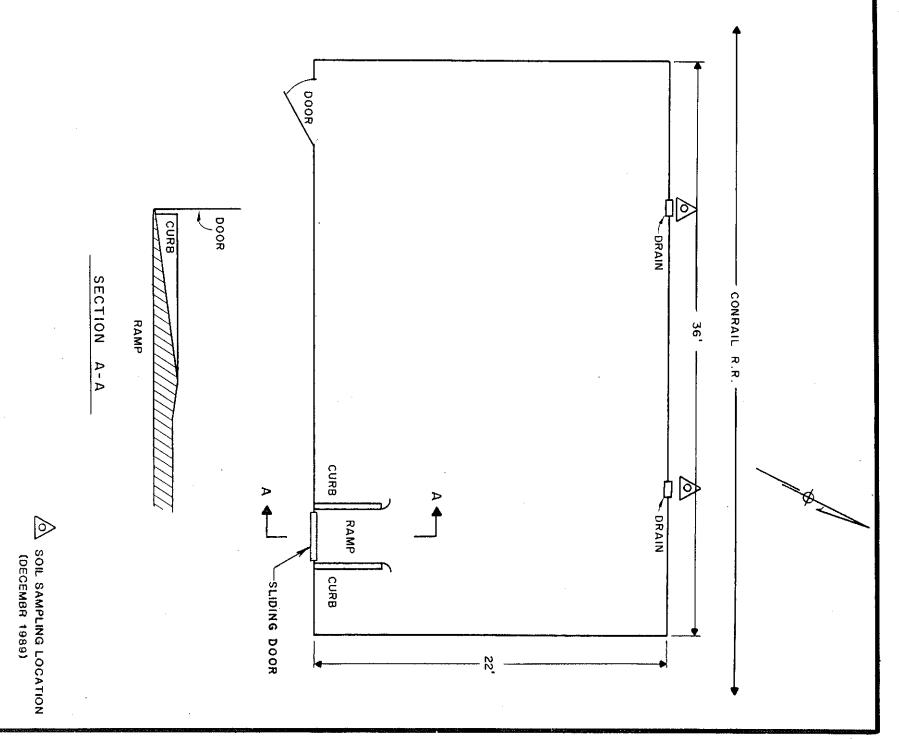
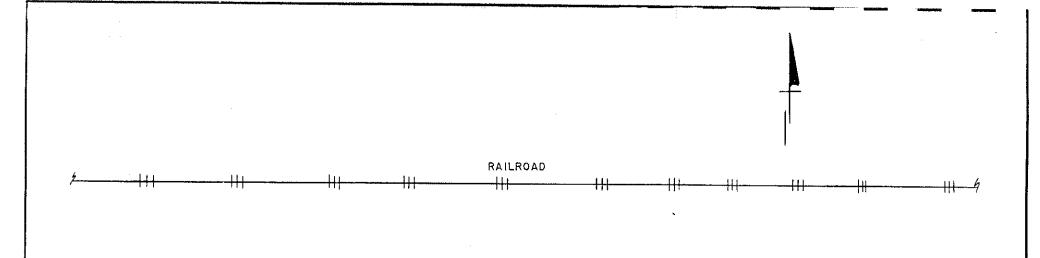
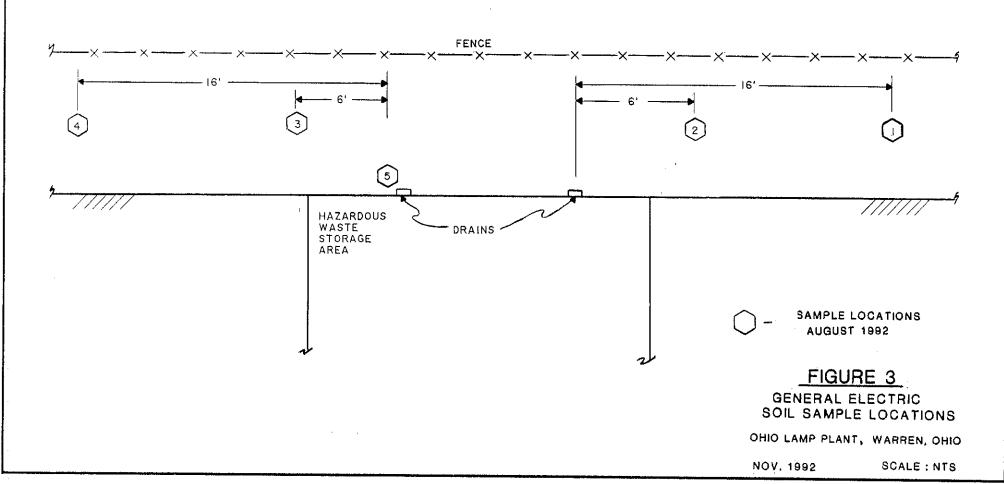


FIGURE 2

GENERAL ELECTRIC
DRUM STORAGE UNIT
OHIO LAMP PLANT
WARREN, OHIO
NOVEMBER 1992
SCALE 1"= 6'





GENERAL ELECTRIC OHIO LAMP PLANT WARREN, OHIO

RINSEWATER SAMPLE ANALYSIS

TABLE

<u>ш</u>

EP TOX. MERCURY TOTAL MERCURY METHANOL METHYLENE CHLORIDE n-PROPYL ACETATE	pH IGNITABILITY REACTIVITY (HCN) REACTIVITY (H2S)	MAY 9, 1990	EP TOX. MERCURY TOTAL MERCURY METHANOL METHYLENE CHLORIDE n-PROPYL ACETATE	pH IGNITABILITY REACTIVITY (HCN) REACTIVITY (H2S)	DECEMBER 14, 1989	PARAMETER
mg/l mg/l mg/l mg/l mg/l	S.U. deg F mg/l mg/l		mg/l mg/l mg/l mg/l mg/l	S.U. deg F mg/l mg/l		UNITS
0.0008 0.0004 1.0 0.0001 0.001	1 1 1		0.0004 1.0 0.0001 0.0001	1 1 1 1		DETECT. LIMIT
0.002 0.002 1.0 1.0	4.7-9.0 > 200 250 500		0.002 0.002 1.0 1.0	4.7-9.0 > 200 250 500	,	CLEAN LEVEL
< 0.0004 ND			NA 0.0051 ND 0.0002	8.1 > 200 < 0.02		STORAGE AREA
< 0.0004 ND			NA 0.0015 ND 0.0003	5.6 > 200 < 0.02 19		BLANK
0.018	1 1 1 1		0.071 ND 0.042	11.3 > 200 < 0.02 16		DRUM WATER

NOTES:

NA - NOT APPLICABLE
-- - NOT ANALYZED

STORAGE AREA SAMPLE IS SECOND RINSE OF FLOOR BLANK IS TRIP BLANK FOR 12/89, AND HOSE WATER FOR 5/90

TABLE N

JIOS SAMPLE ANALYSIS

			Q; I)	2			n 3	(
		D010(1.	CUERTA	1-0	(6000	aratit)	0	(west atatil)	(4111)
PARAMETER	UNITS	LIMIT	TEVEL	1A	18	10	2A	2в	2C
DECEMBER 14, 1989	l								
Hď	s.U.	1	4.7-9.0	8.3	8.6	8.6	10.1	9.1	9.2
IGNITABILITY	deg F	ı	> 200	NEG	NEG	NEG	NEG	NEG	NEG
REACTIVITY (HCN)	mg/kg	t	250	0.10	< 0.02	0.03	< 0.02	0.02	< 0.02
REACTIVITY (H2S)	mg/kg	1	500	< 10	^ 1	10	25	22	13
EP TOX. MERCURY	mg/l	0.0008	0.002	ND	ND	ND	ND	ND	ND
TOTAL MERCURY	mg/kg	0.1	0.002	0.92	0.33	0.22	L	2.1	0.26
METHANOL	mg/kg	1.0	ADL	dN	UN	UN	ND	ND	ND
METHYLENE CHLORIDE	mg/kg	0.1	ADL	ND	ND	ND	0.3	1.3	0.1
n-PROPYL ACETATE	mg/kg	0.012	ADL	d	ND	ND	ND	ND	ND
							, ,		
MAY 9, 1990									
Ħď	s.u.	1	4.7-9.0	l t	[!	9.0	9.3	9.3
IGNITABILITY	deg F	1	> 200	-	}	: :	1	-	!
REACTIVITY (HCN)	mg/kg	1	250	Į.	1	;	-	į	1
REACTIVITY (H2S)	mg/kg	1	500	!	{	}	!	}	}
EP TOX. MERCURY	mg/l	0.0008	0.002	ŧ	1	}	1	1 1	1
TOTAL MERCURY	mg/kg	0.1	0.002	< 0.097	< 0.091	< 0.089	< 0.10	0.45	0.28
METHANOL	mg/kg	1.0	ADL	!	1	1	!	!	;
METHYLENE CHLORIDE *	mg/kg	0.1	ADL	0.008	0.009	0.011	0.008	0.009	0.008
METHYLENE CHLORIDE **	mg/kg	0.1	ADL	<u> </u>	!]	< 0.5	< 0.5	< 0.5
n-PROPYL ACETATE	mg/kg	0.012	ADL	ND	ND	ND	DN	ND	ND

NOTES:

H - NOT DETECTED

NA - NOT APPLICABLE

- NOT ANALYZED

- METHYLENE CHLORIDE DETECTED IN METHOD BLANK AT 0.020 MG/KG. ADL FOR METHOD 8010 IS 0.1 MG/KG. (ANALYSIS BY KILLAM LAB)

ANALYSIS BY DLA LAB

NEG NOT IGNITABLE AS DEFINED IN 40 CFR261.21

ADL ANALYTICAL DETECTION LIMIT

- ZERO INCHES TO SIX INCHES DEPTH, B - 12" TO 18", C - 24" TO 30"

BACKGROUND SAMPLE LOCATIONS SOIL DESCRIPTION

TABLE 3

СЛ	4	ω	7		Location
0 - 2 2 - 8 8 - 14 14 - 36	0 - 2 2 - 8 8 - 16 16 - 28 28 - 30 30 - 36	0 - 2 2 - 8 8 - 18 18 - 36 36 - 60	0 - 2 2 - 8 8 - 16 16 - 44 44 - 48	0 - 2 2 - 8 8 - 16 16 - 18 18 - 33	Depth (Inches)
Black Soil/Slag Brown/Orange Fine Slag Black Slag/Fine Brown Fine Slag Auger Refusal	Black Fine Slag/Soil Brown/Orange Fine Slag Black Fine Slag Brown Fine Slag Sandy Soil/Slag Clay Rubble - Clay Interface	Black/Grey Fine Slag/Soil Brown/Orange Fine Slag Black/Dark Brown Fine Slag Light Brown Clay/Rubble/Slag Brown Clay	Black/Grey Fine Slag/Soil Brown/Orange Fine Slag/Coarse Sand Dark Brown/Black Fine Slag Light Brown Fine Slag (Coarse Sand) Damp Black Fine Slag with Some Fine Sand & Silt Auger Refusal	Black/Grey Soil and Fine Slag Brown/Orange Fine Slag Black Coarse Sand/Fine Slag Clay with Rubble/Slag Brown Clay	Description

TABLE 4
BACKGROUND SAMPLING
AUGUST 20, 1992

	4A 4B 4C	3A 3B	2A 2B 2C	18 10	Location
	0 to 6 12 to 18 30 to 36	0 to 6 18 to 24 30 to 36	0 to 6 12 to 18 42 to 48	0 to 6 12 to 18 18 to 24	Depth <u>(Inches)</u>
Mean 0.663 S. Dev. 1.31	0.058 0.15 0.055	>4.3 * >2.7 ** 0.29	0.091 <0.012 0.20	<0.012 0.098 <0.013	Mercury Concentration (mg/kg)
	8.7 	8.8	9.0	8.7 	p H

^{*} estimated value of 5.7
** estimated value of 3.4

SOIL SAMPLES METHYLENE CHLORIDE ANALYSIS TABLE 5

Trip Blank Equipment Blank	6A 6C	Location 5A 5B 5C	
1		_ <u>Lab</u> <0.0005 <0.0005 0.0046	Centre
<0.001 	<0.001	<0.002 <0.003 0.002	Ceimic
0.0039	2.3 0.92		DLA

Notes:

- 1 1 1
- A 0 to 6-inch depth, B 12 to 18, C 24 to 30 Location 5 obtained 8-20-92 at west drain Location 6, Trip Blank and Equipment Blank obtained 02-04-91 at west drain All units are mg/Kg except Trip Blanks and Equipment Blanks which are mg/l.

BACKGROUND SOILS
METHYLENE CHLORIDE ANALYSIS

TABLE 6

Method Blank Trip Blank Equipment Blank	Mean 4.9 S. Dev. 15.7 Action Level 36.3	4A 4B 4C	3A 3B 3C	2A 2B 2C	1A 1B 1C	Location
<0.05 <0.05		<0.5 <0.5	<0.5 <0.5	<0.5 <0.5	<0.5 57 <0.5	Centre <u>Lab</u>
2000		2	2	_	N ! !	Ceimic <u>Lab</u>

Notes:

A - 0 to 6-inch depth, B - 12 to 18, C - 24 to 30 Samples obtained September 30, 1992 All units are ug/kg (PPb) except Trip & Equipment Blanks which are ug/l See Figure 3 for locations

EXHIBIT A

CORRESPONDENCE OHIO EPA AND GENERAL ELECTRIC



State of Ohio Environmental Protection Agency

.O. Box 1049, 1800 WaterMark Dr. Cohmbus, Ohio 43266-0149

ichard F. Celeste Governor

CLOSURE PLAN APPROVAL

CERTIFIED MAIL

In the state of the state

Re: Closure Plan General Electric - Ohio Lamp OHD 066 052 804/02-78-0153

Ohio Environmental Protection Agency

ENTEREO DIRECTOR'S JOURNAL

586I 9 0 TOF

Dear Mr. Russell

Ave., 1989. Ohio Administrative Code (OAC) in order to demonstrate that General Electric Ohio Lamp's proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12. closure plan for a hazardous waste drum storage area located at 1210 N. Park Warren, Ohio. The closure plan was submitted pursuant to Rule 3745-66-12 of the istrative Code (OAC) in order to demonstrate that General Electric 1988, General Electric Revisions to the closure plan were received on February Ohio Lamp submitted to Ohio

closure plan of 3745-66-12. No The public was given the opportunity to submit written comments regionsure plan of General Electric - Ohio Lamp in accordance with OAC No comments were received by Ohio EPA in this matter. regarding

conclude that, with modifications, the closure plan for the hazardous of facility at General Electric - Ohio Lamp meets the performance standard contained in OAC Rule 3745-66-11 and complies with the pertinent parts Based upon review of the 3745-66-12. company's submittal and subsequent revisions, I ications, the closure plan for the hazardous waste ric - Ohio Lamp meets the performance standard of

The closure plan submitted to Ohio EPA by General hereby approved with the following modifications: EPA by General Electric

- The revised closure plan mentions that the independent, registered professional engineer (PE) will be present during all sampling events. The independent PE shall also be present during inventory removal, pad decontamination, and for inspection of the concrete pad surface prior decontamination.
- 2. The revised closure plan states that the GE employees will inspect evaluate all cracks in the cement flooring of the storage pad. GE independent PE provide GE employees this inspection rather than, or in S storage pad. GE shall Dather than or in the North and

I certify this to be a true and accurate copy of the official decument as filed in the records of the Ohio Environmental Protection Agency.

AND SAMES INC.

1 1989

V. Carrier Microbinum Date 7/6/89

- ω linear feet of crack. shall be sampled along its length, one if structural cracks in the pad penetrate the pad surface. GE shall sample soils beneath such penetrating structural cracks to similar depths as those proposed for the drains (0-6", 12"-18" and 24"-30"). Each crack closure plan does not address the actions sample boring for every six (6) to be taken by
- all critical closure these shall notify Mark activities and Bergman, Ohio EPA, NEDO, at least 10 activities so that he may be present collect split samples if desired. days prior to observe
- construction and be decontaminated after adequate both distilled water and acetone. All decontamination rinseate shall managed appropriately (i.e., spent acetone rinseate shall be managed hazardous waste). fashion. The sampling scoop shall be of stainless to describe the sampling scoops used for soil sampling in each sampling event using stee]
- 5 scrutiny and possible rejection. the unit. each boring from soil horizons The clean level for pH proposed by GE is unacceptable. GE shall establish background for pH or use the range (4.7-9.0 S.U.). Background soil pH shall be established from background soil samples taken in areas that are not impacted by any waste management activities. A minimum of All background sampling results background sample borings is required with samples taken in from soil horizons corresponding to soil horizons underneath shall be subject to Ohio EPA
- generated from pad decontamination efforts. Rinsewaters generated from equipment decontamination efforts collected, tested, and appropriately managed along with rinseates sha11 be
- 8 GE shall specify the name, identification number, its (TSDF) contracted hazardous waste treatment storage or disposal facility (TSDF) contracted to manage hazardous wastes generated from closure activities. If more than one waste management facility is chosen, then GE shall provide the than one waste management facility is information shall be submitted along contracted

contamination or to protect public health or safety or seek any appropriate legal or equitable hazardous waste, Notwithstanding compliance with the terms of such other response as deemed necessary; or initiate appropriate action; or on the basis of Chapters 3734 or 6111 of issue an order pursuant to Section 3734.20 et seq. of the hazardous constituents any information that there is or has been a release of the Revised Code requiring corrective remedies to abate pollution or the closure plan, the environment. the Director

Ohio Environmental Protection Agency

SAST O O TORS

certify this to be a true and accurate copy of the fficial document as filed in the records of the Ohio Environmental Protection Agency.

Hieroly Messerinus Date 7/6/89

incurred by the Director in undertaking such actions. penalties and punitive damages, terms and conditions requiring corrective action pursuant to Chapters 3.6111 of the Revised Code; the right to seek injunctive relief, monetary amended by the Response, Nothing herein shall waive the right of the Director ("CERCLA") actions relating to the facility, and to seek recovery for any costs la₩, the closure plan pursuant Compensation and Liability Act of 1980, 42 U.S.C. §9601 et y the Superfund Amendments and Reauthorization Act of 1986, _A") or to take any other action pursuant to applicable Federa including but not limited to the right to issue a permit with to undertake any removal, remedial, and/or to the Comprehensive Environmental to take action beyond the to Chapters 3734 or Pub.

Director of the Ohio Environmental Protection Agency and the Environmental Enforcement Section of the Office of the Attorney General within three (3) days of filing with the Board. An appeal may be filed with the Environmen Board of Review at the following address: notice of filed with the complained of and the grounds Revised Code. You are notified that this the Environmental Board of Review pursuant to Town Street, Room 300, Columbus, Ohio the Director's action. Environmental Board of Review within thirty (30) days after Director's action. A copy of the appeal must be served on t The appeal must be in writing and set forth the action action of upon which the appeal An appeal may be filed with the Environmental the Director Environmental Board of Review, 43266-0557 Section 3745.04 of the 'n. is based. final and may be appealed It must be Oh i o the

Management Section, P.O. Box 1049, Hazardous Waste Management, Attn: Thomas Crepeau, Program Planning and submitted to: statement found in OAC 3745-50-42(D). engineer that the facility has been closed in accordance with the approved Ohio EPA requires closure the certification by the owner owner or operator of a is completed, Ohio Environmental Protection Agency, Division of Solid certification by the Ohio Administrative Code Rule 3745-66-15 Columbus, the owner or operator shall include the or operator and a registered professional facility to submit These Ohio certifications should be 43266-0149. to the Director of

Sincerely,

Richard L. Shank, Ph.D. Director

RLS/PV/pas

cc: Paul Vandermeer, Ohio EPA, DSHWM Lisa Pierard, US EPA-Region V Joel Morbito, USEPA - Region V Tom Crepeau, Ohio EPA, DSHWM Central Fi Mark Bergman, NEDO, Ohio EPA

18730

Environmental Protection Agency. official document as filed in the records of the Ohio I certify this to be a true and accurate copy of the

necessia Date 2/6/PG

Ohio Environmental Protection Agency ENTERED DIRECTOR'S JOURNAL

DLA Division
Thom Hill Industri

Thorn Hill Industrial Park 100 Allegheny Drive Warrendale, PA 15086-7565 Telephone: 412-772-0200 Fax: 412-772-1955

December 7, 1989

Mr. Mark Bergman Ohio Environmental Protection Agency Northeast District Office Division of Solid and Hazardous Waste Management 2110 E. Aurora Road Twinsburg, OH 44087

GENERAL ELECTRIC COMPANY
OHIO LAMP PLANT
OHD 066 052 804
CLOSURE PLAN APPROVAL MODIFICATIONS
KILLAM PROJECT NO. 2G018.11

Mr. Bergman:

General Electric Company's Ohio Lamp following modifications are made to the General approval Ohio the OEPA: following letter is Environmental letter, the OEPA approved Electric Company's Ohio Company's Ohio Protection Agency's sent to satisfy the modification the approved closure plan as required July 6 approval letter. In closure plan submitted for Plant in Warren, Ohio. requests of the the The the

- An independent, present during all critical closure activities. registered professional
- 2 surface defects which would allow for the migration of the underlying soils, a soil sampling plan will be in Soil sampling will be conducted in all areas where cra intervals along the length of the crack. throughout the time, the PE will determine the extent and location of any and all thoroughly decontamination of the inspect all surfaces entire depth conducted in all edepth of the in the storage concrete storage areas, pad unit. the cracks extend implemented. at six-inch wastes Αt

Samples field t technician. ¥.... be collected at these Three discrete samples locations by w : | | 00 an collected experienced 4



Mr. Mark Bergman December 8, 1989 Page Two

24 - 30 inches. All samples will be discrete and not composited. The samples will be collected with a splitspoon sampler which shall be decontaminated between the collection of each sample. Decontamination will include pressuring rinsing with distilled water. Samples will be collected in air-tight, prelabeled, glass bottles which shall be supplied by the laboratory performing the analyses. Chain-of-custody forms will be completed upon the samples there is a samples there is an all samples there is a samples there is a sample of the sampling activities and chain. samples throughout.

approved closure plan of February, 1989. samples will be analyzed for the parameters listed the

- ω the equipment. The facility selected for disposa will be chosen following the analysis of the wastes hazardous waste disposal facility. This will include all rinsewater generated through the decontamination of the pad and the equipment. The facility selected for disposal of the wastes Upon completion of closure activities, wastes genera decontamination activities will be disposed at rdous waste disposal facility. This will i generated generated. ىم licensed
- . DLA of the approved closure plan. Laboratory will perform the analytical work required as part
- ហ results and 9.0 S.U. Soil samples analyzed for of the nalyzed for soil pH will be analytical testing indicates considered clean when a soil pH between 4.7
- 6 The closure of the drum storage units at this facility are scheduled for the week of December 11, 1989. We will notify your activities. office to inform you of the actual date for

Howard have any questions Russell of General Electric at 216/373-1400. regarding this information please contact 9

Very truly yours,

Scott A. Nesbit Engineer

SAN: tlk/0353K

cc: Mr. Howard Russell, GE, Ohio Lamp



DLA Division

Thorn Hill Industrial Park 100 Allegheny Drive Warrendale, PA 15086-7565 Telephone: 412-772-0200 Fax: 412-772-1955

January 10, 1990

Ohio Environmental Protection Agency Division of Solid and Hazardous Waste Management PO Box 1049, 1800 Watermark Drive Columbus, OH 43266-0149

ATTENTION: Paul Vandemeer

GENERAL ELECTRIC COMPANY OHIO LAMP PLANT EPA ID# OHD 066 052 804 KILLAM PROJECT NO. 2G018

Gentlemen:

request allowed following at would for the the General extend letter closure Electric, the closu a request for an 180 day extension on the time and certification of closure of a drum storage ctric, Ohio Lamp Plant in Warren, Ohio. This closure period from January 2, 1990 to July 1,

0f but storage laboratory analysis difficulties request is a not being performed, in accordance with the approved closure plan for the Closure of the facility commenced before the original deadline been completed as of this date. Delays have been caused due ties in meeting the established clean levels, and delays in analysis of samples. Additionally, the abundance of this type made in order to complete the clean closure of the drum rdance with the approved closure plan for the delayed established clean levels, and delays in Additionally, the abundance of this type ed the selection of the decontamination

If you have any questions regarding this request please contact me at earliest convenience. your

Very truly yours,

Scott A. Nesbit Engineer

cc: Mr. Mark Bergman OEPA, NEDO

Mr. Howard Russell, GE, Ohio Lamp Mr. Donal Grube, GE, NELA Park

Mr. Joseph Morehart, Killam, Columbus



State of Ohio Environmental Protection Agency

 O. Box 1049, 1800 WaterMark Dr. olumbus, Ohio 43266-0149

Richard F. Celeste Governor

January 19, 1990

OHD 066 052 804 General CLOSURE PLAN Electric, 0hio EXTENSION

100 Allegheny Drive Warrendale, PA 15086-7565 Thorn Hill Industrial c/o Killam Associates General Electric Ohio Scott A. Nesbit Park **DLA Division** Lamp

Mr. Nesbit:

adequate of Ohio EPA. The public notice of the amendment will appear in the <u>Warren</u> <u>Tribune Chronicle</u> the week of January 22, 1990, beginning the thirty (30) comment period. Please be certain that the time extension request will be thirty (30) day public such, this facility facility. complete the closure of the hazardous waste drum storage area at your to acknowledge the receipt of your request for an extension of time is considered an amendment of the already approved closure plan. is action will require the public notice of the proposed amendment, to complete clasure. An extension of time to complete closure of a hazardous waste comment period and the written approval of the Director day ٥.

If you have any questions (614/644-2956) or Thomas (Columbus. uestions concerning this matter, please contact me Thomas Crepeau (614/644-2934) at the Ohio EPA Cen at the Ohio EPA Central Office

incere

Paul Vandermeer

Technical Assistance Section Division of Solid and Hazardous Waste Management

PLV/pas

cc: Mark Bergman, DSHWM Central NEDO Obio EPA File (Closure (Closure), Ohio EPA

X) JAN 25 1990 CEIV 171 O

KILLAM ASSOCIATES



of Ohio Environmental Protection Agency

.U. Box 1049, 1800 WaterMark Dr. Uclumbus, Ohio 43265-0149

APR - 2 1990

KILLAM ASSOCIATES



CLOSURE PLAN EXTENSION APPROVAL

Richard F. Celeste Governor

CERTIFIED MALL

March 26, 1990

Re: Closure Plan Extension General Electric, Ohio Lamp OHO 066 052 804

Mr. Scott A. Nesbit General Electric, Ohio Lamp c/o Killam Associates DLA Division Thorn Hill Industrial Park 100 Allegheny Drive Warrendale, PA 15086-7565

Dear Mr. Nesbit:

On January 12, 1990, General Electric, Ohio Lamp Plant submitted a request for an extension to the closure period specified in the approved closure plan for 180 days. The extension request was submitted pursuant to OAC Rule 3745-66-13(B) as closure will require longer than the 180 days period specified in OAC Rule 3745-66-13. General Electric, Ohio Lamp Plant has requested this extension due to difficulties in meeting the clean standards.

per OAC Rule 3745-66-13(B)(2). Ohio Lamp Plant will continue to take all steps to prevent a threat to human health and the environment from the closed but inactive waste management unit Therefore, closure of the drum storage area will require greater than 180 days because of difficulties in meeting the clean standards. General Electric,

were received in this matter. Plant in accordance with OAC Rule 3745-66-13. The public notice appeared the week of January 22, 1990, in the Warren Tribune Chronicle. No commen request for an extension to the closure The public was given the opportunity to submit written comments period for General Electric, Ohio regarding

A 180 day extension of time (until July 1, 1990) to complete closure ۲.

certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Caver Date 3-16-90

Ohio Environmental Protection Agency
ENTERED DIRECTOR'S JOURNAL

solid waste management unit, regardless of the time at which waste was placed required under the Hazardous and Solid Waste Amendments of 1984 regarding corrective action for all releases of hazardous waste or constituents from any release General Electric, Ohio Lamp Plant from-any responsibilities as be advised that approval of this closure extension request does not

Waste Management, Attn: To Columbus, Ohio 43266-0149. specified in OAC 3745-50-42(0). These certifications should be submitted to: Ohio Environmental Protection Agency, Division of Solid and Hazardous Waste Management, Attn: Tom Crepeau, Data Management Section, P.O. Box 1049, closure plan. engineer requires the that the facility has been closed in accordance with the approved plan. The owner or operator certification shall follow the format certification by the owner is completed, owner or operator of a the Ohio or operator and a registered professional Administrative Code Rule 3745-66-15 facility to submit to the Director of the

East Town Street, Room 101, Columbus, Ohio 43266-0557. days of filing with the Board. An appeal may be filed with the Environmental Board of Review, 250 days of filing with the Board. Director of the Ohio Environmental Protection Agency and the Environmental Enforcement Section of the Office of the Altorney General within three (3) notice of the Director's action. A copy of the appeal must be served on the complained of and the grounds upon which the Revised Code. You are notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.04 of the Ohio The appeal must be in writing and set forth the action appeal is based. It must be

Richard L. Shank, Ph.D

> Environmental Protection Agency. official document as filed in the records of the Ohio I certify this to be a true and accurate copy of the

, Date

RLS/PV/pas

CC: Tom Crepcut, Lisa Pierard, USEPA, Region NEDO, Ohio EPA Tom Crepeau, Morbito, USEPA, Region V Vandermeer, DSHWM Central File, DSHWM, Region V Ohio EPA Ohio EPA

Ohio Environmental Protection Agency THURS SHOTTERED CHEINS



DLA Division

Thorn Hill Industrial Park 100 Allegheny Drive Warrendale, PA 15086-7565 Telephone: 412-772-0200 Fax: 412-772-1955

June 7, 1990

Ohio Environmental Protection Agency Division of Solid and Hazardous Waste Management PO BOX 1049 1800 Watermark Drive Columbus, Ohio 43266-0149

ATTENTION: Paul Vandemeer

GENERAL ELECTRIC COMPANY - OHIO LAMP PLANT EPA ID NO. OHD 066 052 804 KILLAM PROJECT NO. 2G018

Gentlemen:

on the attached figure. and total mercury above sampled and Warren, Ohio, was cleaned twice. levels tables accordance hazardous for and with all contaminants. indicate that analyzed. waste the storage area approved closure The the the results of the analysis clean levels. The rinseate The contractor cleaned the area each time in soils, however, at General Electric's plan. had concentrations Soil sampling The had pH, methylene are shown in the attached rinseate Ohio Lamp plant locations below the and soils chloride, are clean shown were 'n

requesting that cleaning agent relatively addition the analytical detection limit for Method 8010 analysis results for Methylene laboratory the results chloride MOl quality the Ξ. these concentrations levels for the second soil may partially be laboratories. control blank. was found at of methylene sampling are below that level. As low levels be accepted as clean. chloride Methylene such, ച result indicated in the methylene but chloride 0f was lab contamination. also is. the result, chloride ρJ present commonly. is 0.1 mg/1, Due analysis to ¥ (D Ξ. the the In



Page Two

9.0 level, we are requesting that the existing pH levels be accepted as clean. level of 12 for pH, and the Secondly, the pH levels 9.0 clean level). are only slightly above the clean levels Since the original closure plan had an upper clean actual levels are only slightly above the revised (e.g.

mercury be approved as clean. mercury leachability is very low, we request that the existing levels Due to the low levels of total mercury present concentration in the EP toxicity leachate analysis was less than $0.0008~\mathrm{mg/l.}$ The had concentrations ranging from 2.1 mg/l. The total mercury analysis for the first samples showed levels between second set of samples, taken 6" to 12" less than 0.091 to 0.45 mg/l. in the soils and the fact that from the first set, The mercury 0.22

earliest convenience. hereby request a 90-day extension to complete all closure and certification. The current closure deadline you have any questions regarding the above, please contact me at your is July 1, 1990. Based on the above requests, we

Very truly yours,

Rick A. Myers Senior Project Engineer

RAM: PRZ/4024D

cc: M. Bergman H. Russel -

- GE (Ohio Lamp) GE (Nela Park)

Grube

JENERAL ELECTRIC OHIO LAMP PLANT WARREN, OHIO

RINSEWATER SAMPLE ANALYSIS

ND -		1.0	0.01	ng/t	n-PROPYL ACETATE
: —	- -	1.0	0.0001	mg/l	METHYLENE CHLORIDE
:	- -	1.0	1.0)/gm	METHANOL
< 0.0004	< 0.0004	0.002	0.0004	mg/l	TOTAL MERCURY
:	-	0.002	0.0008	1/6w	EP TOX. MERCURY
	_				
!	:	500	•	J/bu	REACTIVITY (H2S)
;	- -	250	<u> </u>	J/Gu	REACTIVITY (HCN)
:	:	> 200	-	deg F	IGNITABILITY
:	: -	4.7-9.0	•	s.u.	PK
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				INATION	MAY 5, 1990 DECONTAMINATION
-		_			
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;	:	1.0	0_01	ma/	n-PROPYL ACFTATE
0.0003	0.0002	1.0	0.0001	mg/L	METHYLENE CHLORIDE
* 5	<u>-</u>	1.0	1.0		METHANOL
0.0015	0.0051	0.002	10.0004)/G	TOTAL MERCURY
NA	NA	0.002	_	J/Gu	ÉP TOX. MERCURY
_	_	_			
19	10	500	,	J/Bu	REACTIVITY (H2S)
< 0.02	1 < 0.02 [250	')/Bu	REACTIVITY (HCN)
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5.6	8.1	4.7-9.0 [_	s u	돺
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<u> </u>	_		NOIL	1989 DECONTAMINATION	DECEMBER 14, 1989 DE
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BLANK	AREA	LEVEL [LIMIT	STIND	PARAMETER
	STORAGE	CLEAN [DETECT.		

NOTES:

NO - NOT DETECTED
NA - NOT APPLICABLE
-- NOT ANALYZED

ÆNERAL ELECTRIC OHIO LAMP PLANT WARREN, OHIO

SOIL SAMPLE ANALYSIS

8		*	8 .	8	8	- -	ADL []	0.012	mg/(n-PROPYL ACETATE
Ž	0.008	0.009	0_008	<u>:</u>	: 	:	<u> </u>	0 .1]/Bu	METHYLENE CHLORIDE
ŀ		;	:	;	;	;	ADL	1.0]/bu	METHANOL
22	0.28	0.45	< .10	< .089	< .091	< .097	0.002	0.1	mg/t	TOTAL MERCURY
1		1	¦ 	!	;	; —	0.002	0.0008	1/6w	EP TOX. MERCURY
							· ·			
1		;	;	;	<u>{</u>	:	500	1	1/6u	REACTIVITY (H2S)
ļ		-	;	;	-	<u> </u>	250	•	mg/(REACTIVITY (HCN)
1		:	¦ _	¦ 	; !	:	> 200	<u>.</u>	deg F	IGNITABILITY
9.3	9	9_3	9.0	:	:	:	4.7-9.0		s.u.	PK
	_	_			_		=			
								i	INATION	MAY 5, 1990 DECONTAMINATION
							==		-	
1		:	;	:	;	;	ADL	0.012	J/Bu	n-PROPYC ACETATE
. 1		 	0.3	3	8	₹ —	<u>ا</u>		J/Bu	MEINTHERE CHLOKIDE
동	_	8	8	*	€	*		·)/E	METHANOL CO.
0.26	-0.	2.1		0.22	0.33	0.92	0.002	0.1	J/É	TOTAL MERCURY
픙		- -	€	8	¥6	8	0.002	0.0008	J/Gw	EP TOX. MERCURY
13		722	8	10	10	^ 10 	500	,	J/6w	REACTIVITY (H2S)
o.	< 0.02	0.02	< 0.02	0.03	0.03	0.10	250	- -	mg/₹	REACTIVITY (HCN)
NEG	_	NEG	NEG	NEG -	NEG	NEG [> 200	<u> </u>	deg F	IGNITABILITY
9	<u> </u>	9.1	10.1	8.6	8.6	8.3	4.7-9.0	1	s.u.	Hq
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NOTES:

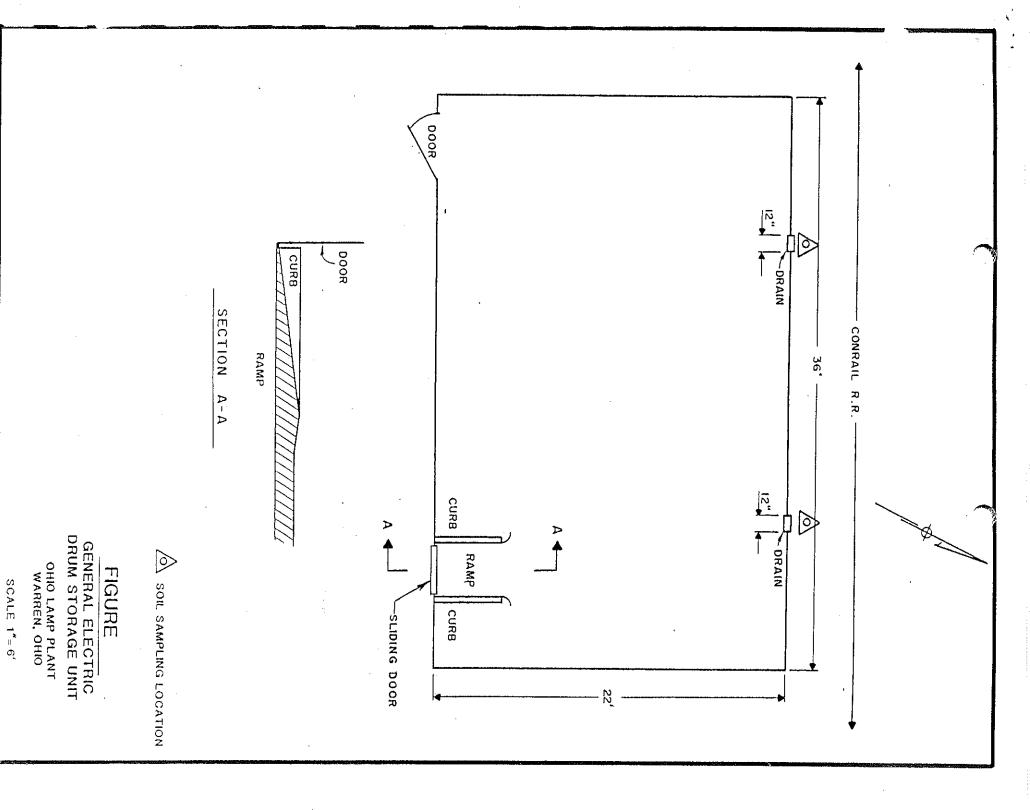
ADL - ANALYTICAL DETECTION LIMITS

ND - NOT DETECTED

-- NOT ANALYZED

** - METHYLENE CHLORIDE DETECTED IN METHOD BLANK AT 0.020 MG/L

ADL FOR METHOD 8010 IS 0.1 MG/L.





State of Ohio Environmental Protection Agency

). Box 1049, 1800 WaterMark Dr. Jumbus, Ohio 43266-0149

Richard F. Celeste Governor

CLOSURE PLAN EXTENSION APPROVAL

CERTIFIED MAIL

July 18, 1990

Re: Closure Plan Extension General Electric Ohio Lamp OHD066052804

100 Warrendale, Mr. Rick A. Myer General Electric / 0 horn Killam rn Hill Allegheny Drive Industrial Associates PA. Myers 15086 Ohio -7565 Park Lamp

Dear Mr. Myers:

submitted pursuant to Administrative closure plan until lectric Ohio 10 day an extension discovery of unexpected soil contamination. period specified in 14, 1990, Lamp Code to the closure period specified in the ilo 28, ilo 390. The extension $r \epsilon$ General has September 28, (OAC) as closure will require ified in OAC Rule 3745-66-13. Rule requested Electric 3745-66-13(B) of 1990. this Ohio Lamp extension of the Ohio extension request submitted a longer General time due approved request than C d was the

General Electric Ohio Lamp will continue prevent a threat to human health and the unclosed but inactive waste management u = 13(B)(2). management unit to take all environment per OAC Rule steps from 3745 the -66-

An extensi extension 28, of time, 1990. allowed н 0 5 closure ۲. hereby granted until

does of hazardous Amendments of 1984 does not release responsibilities n the uni unit. φ advised that unit, waste or ed that approval e General Electri s as required und regardless regarding constituents dless of the lectric under corrective of this Ohio Lamp from the Hazardous from time at any closure action which solid for all extension and waste any waste Solid SBM release reque Waste place

Management, Box 1049, (Protection Agency, Thėse operator approved engineer operator 3745-66-15 When the closure certifications should be Director of shall include and a qualified, independent, registered professional that the facility has been closed in accordance with the closure plan. Columbus, Ohio 43266-0149. requires بر زي completed, the Division of the owner the statement found in OAC e owner or operator of a facility to Ohio EPA certification by the owner The certification the submitted to: Ohio Solid and Hazardous eau, Data Management Ohio Administrative o ţ by the facility owner or 3745-50-42(D). Waste Section, Code Environmental Rule 01 submit P.O.

Sinceply

Richard L. Shank, Ph.I

RLS/PLV

O c: Tom (Mark Lisa Joel Paul sa Pierard, USEPA, Re el Morbito, USEPA, Re n Crepeau, Ohio EPA, ck Bergman, Ohio EPA, Vandermeer, EPA, Ohio Region V A, DSHWM (PA, NEDO Region EPA, Central DSHWM File



OHU066052804

Corporate Environmental Programs General Electric Company 3135 Easton Turnpike, Fairfield, CT 06431

THREINED

March 26, 1990

CFFICE OF RCRA WASTE MATTACEMENT DIVISION EPA, REGION V

Re: Demonstration by General Electric Company of Financial Responsibility for Liability Coverage and Closure and/or Post Closure Care

Dear Sir or Madam:

The attached information is being submitted by the General Electric Company to comply with the financial responsibility requirements relative to your Agency's hazardous waste regulations:

- o Letter from the Chief Financial Officer, with wording for the financial test, including:
 - -- Attachments listing affected facilities as specified in the Letter from the Chief Financial Officer
 - -- List of facilities whose closure and/or post-closure cost estimates differ from the inflation-adjusted estimates from last year, including facilities which no longer require financial assurance, and explanations for those discrepancies. Please note that we used an inflation factor of 4.8%, which was derived from the most recent Implicit Price Deflator for the GNP, available as of January 30, 1990. All estimates were rounded to the nearest thousand.
- O Copy of General Electric Company's 1989 Annual Report which includes the independent public accountant's report on examination of financial statements for the latest completed fiscal year.
- O Special report from KPMG Peat Marwick Certified Public Accountants with respect to General Electric Company's financial information included in the Letter from the Chief Financial Officer.
- O Copy of General Electric Company's 1989 Form 10-K to the Securities and Exchange Commission.

If you have any questions about the information submitted, please contact me at (203) 373-2950.

Very truly yours,

Paul Chin

Environmental Consultant

PC:lcm Enclosures

PA ID#	FACILITY	STREET	CITY	ST	ZIP
,		·		*===	*********
ALD981026677	GE PLASTICS-BURKVILLE OPERATION	ONE PLASTICS DRIVE	BURKVILLE	AL	36752
CAD030584502	GE LOS ANGELES SERVICE CENTER	3601 E. LaPALMA AVENUE	ANAHEIM	CA.	92806
CAT000611095	GE ED & C	11115 VAN OWEN STREET	NORTH HOLLYWOOD		
CAD009208075	GE SAN FRANCISCO SERVICE CTR.	5441 E. 14TH STREET	DAKLAND		94601
CAD009542721	GE EMC/ONTARIO	1923 E. AVION STREET	ONTARIO		91761
CAD053914206	GE VALLERCITOS NUCLEAR CENTER	PO BOX 460	PLEASONTON		94566
CTD001453711	GE	1285 BOSTON AVENUE	BRIDGEPORT	CT	06601
CTD000842492	GE WASTEWATER SETTLING AREA	41 WOODFORD AVENUE	PLAINVILLE		06062
FLD001690924	GE SIMULATED & CONTROL SYSTEMS DEPT	1800 VOLUSIA AVENUE	DAYTONA BEACH	FL	32015
GAD003308145	GE MEDIUM TRANSFORMER OPERATION	1935 REDMOND CIRCLE	ROME	GA	30161
IAD075836130	GE APPLIANCE CONTROL DEPARTMENT	1803 RADIANT ROAD	CARROLL	TA	51401
IAD005272703	GE SWITCHGEAR OPERATIONS	510 AGENCY ROAD	W. BURLINGTON		52655
IAD000678037	GE BURLINGTON BASKET COMPANY	1404-1418 WEST PLEASANT ST.	W.BURLINGTON		52655
1LD005453691	GE GENERAL PURPOSE CONTROLS	1601 GE ROAD	BLOOMINGTON	11	61704
ILD070015714	GE SERVICE SHOP - CHICAGO	6045 SOUTH NOTTINGHAM	CHICAGO	-	60638
ILD980503023	GE	1540 S. 54TH AVENUE	CICERO		60650
1LD005443866	GE MATTON LAMP	1501 S. 19TH STREET	MATTON		61938
1LD062338694	GEIPS - MORRIS PLANT	7555 E. COLLINS ROAD	MORRIS .		60450
1LD005272992	GE APPLIANCE CONTROLS	709 W. WALL STREET	MORRISON		61270
IND000803726	GE BLOOMINGTON PLANT OPERATIONS	301 NORTH CURRY PIKE	BLOOMINGTON	1 N	47402
IND004557815	GE SPECIALTY TRANSFORMER OPERATION	1701 COLLEGE STREET	FORT WAYNE		
IND005448683	GE GENERAL PURPOSE MOTOR (AND GEA)	2000 TAYLOR STREET	FORT WAYNE		
IND006040299	GENERAL ELECTRIC COMPANY	12TH ST. SE. P.O. BOX 657			47441
1ND006376362	GE PLASTICS	LEXAN LANE	MT. VERON		47620
KSD041917501	GE-AENC	STROTHER FIELD	ARKANSAS -CITY	KS	67005
		APPLIANCE PARK 26-101	LOUISVILLE	KY	40225
KYD074047556	GE AIRCRAFT ENGINES	US HIGHWAY 41A ROUTE 2	MADISONVILLE		42431
0053782413	GE NEW ORLEANS SERVICE CENTER	1115 Dearmas Street	NEW ORLEANS	LA	70114

'A 1D#	FACILITY	STREET	CITY	ST	ZIP
MDD046279311	GE APPLIANCE PARK-EAST	9001 SNOWDEN RIVER PARKWAY	COLUMBIA		21046
MID050676622	GE DETROIT SERVICE CENTER	18075 KRAUSE STREET	RIVERVIEW	MI	48192
MND980501407	GE MINNEAPOLIS SERVICE CENTER	2025 49TH AVENUE NORTH	MINNEAPOLIS	MN	55430
	GE MOTORS - SPRINGFIELD	E.SUNSHINE	SPRINGFIELD	MO	65808
MOUUU0312375	GE ST. LOUIS LAMP	6251 ETZEL AVENUE	ST. LOUIS	MO	63133
		1223 FAIRGROVE CHURCH ROAD	HICKORY	NC	28601
NCD050409150	GE NUCLEAR FUEL & COMPONENT MFG.	CASTLE HAYNE RD. MC J26	WILMINGTON	NC	28402
NJD003918570	GE NEW YORK SERVICE CENTER	6001 TONNELLE AVENUE .	NORTH BERGAN	NJ	07047
	GE CAPACITOR & POWER PROTECTION	381 UPPER BROADWAY	FORT EDWARD	NY	12828101
	GE CAPACITOR & POWER PROTECTION	JOHN STREET	HUDSON FALLS	NY	12839
NYD002084135	- -	1 RIVER ROAD, BUILDING 41-111	SCHENECTADY	NY	12345
	GE CORPORATE RESEARCH & DEVELOPMENT	8LDG. K-1, ROOM 1A69	SCHENECTADY	NY	12301
	GE PLASTICS - SELKIRK OPERATIONS	NORYL AVENUE	SELKIRK	NY	12158
	GE ELECTRONICS PK, BG 7 CHEM ANNEX GE BUFFALO SERVICE CENTER	• • • • • • • • • •	SYRACUSE	NY	13221
	GE AEROSPACE ELECTRONIC SYSTEMS	175 MILENS ROAD	TONAWANDA	NY	14150
	GE SILICONE PRODUCTS DIVISION	FRENCH ROAD	UTICA	NY	13503
	ar stricour recognis statistole	260 HUDSON RIVER ROAD	WATERFORD	NY	12188
	GE AIRCRAFT ENGINES - EVANDALE	1 NEUMANN WAY - MD N123	CINCINNATI	OK	45215
OHD000817304		1350 TENNESSEE AVE.	CINCINNATI	OH	45229
OHD009101494	GE CINCINNATI SERVICE CENTER	156 CIRCLE FREEWAY DRIVE	CINCINNATI	HO	45246
	GE CHEMICAL PRODUCTS	333 W. SEYMOUR AVENUE	CINCINNATI	ОН	45216
	GE EUCLID SPECIALTY	1099 IVANHOE ROAD	CLEVELAND	OH	44110
	GE COSHOCTON PLANT	1133 E. 152ND STREET	CLEVELAND	OH	44110
	GE LIGHTING - TUNGSTEN PRODUCTS	1350 SOUTH SECOND STREET	COSHOCTON	ОН	43812
DHD000721456		21800 TUNGSTEN ROAD 3024 SYMMES RD.	EUCLID		44117
	JEFFERSON WELD PLANT	85 W. ASTUBULA	HAMILTON		45215
	GE NILES/MAHONING GLASS	403 N. MAIN STREET	JEFFERSON		44047
	GE RAVENNA LAMP	6800 N. CHESTNUT STREET	NILES		44446
OHD066052804		1210 N. PARK AVENUE	RAVENNA -		44266
OHD004224960		1313 W. MARKET STREET	WARREN WARREN		44483
OHD004226171	GE YOUNGSTOWN LAMP	40 HUGHES STREET	YOUNGSTOWN		44485 45027
PAD060682622	GE BRIDGEVILLE GLASS	MAYER STREET	BRIDGE	_	
	GE - ERIE PLANT	2901 EAST LAKE ROAD, BLG 13-2	BRIDGEVILLE		15017
	5125EL 6145EL	INDUSTRIAL DRIVE			16531
PAD003026903		NEW HOLLAND AVENUE	GROVE CITY		16127
		HE HELDRY MERUE	LANCASTER	PA	17604

A ID# FACILITY STREET CITY ST ZIP SCD067002147 GE MEDICAL SYSTEMS 3001 WEST RADIO DRIVE FLORENCE SC 29501 TXD064114242 GE DALLAS SERVICE CENTER 3202 MANOR WAY DALLAS TX 75235 TXD060718269 GE HOUSTON SERVICE CENTER 8800 WALLISVILLE ROAD HOUSTON TX 77029 VADO03132255 GE MOBILE COMMUNICATIONS MOUNTAIN VIEW ROAD LYNCHBURG VA 24502 VAD070360219 GE WINCHESTER LAMP ROUTE 3, PO BOX 310 WINCHESTER VA 22601 VTD002083434 GE ARMAMENT SYSTEMS DEPARTMENT LAKESIDE AVENUE VT 05401 BURLINGTON WADO09278706 GE GEAE SCMC/SEATTLE 220 SOUTH DAWSON STREET SEATTLE WA 98108 WID086686003 GE TUBE MANUFACTURING 4855 WEST ELECTRIC AVENUE MILWAUKEE WI 53219 WID980683569 GE E. DALE TROUT 3114 N. GRANDVIEW BLVD. WAUKESHA WI 53188 WID006121347 GE APPLIANCES - MILWAUKEE PLANT 2205 SOUTH 43RD STREET WEST MILWAUKEE WI 53219

TOTAL FACILITIES: 74

TOA ID#	FACILITY	STREET	CITY	ST	ZIP
1				====	3=55555555
ILD079135133	GE PLASTICS - LINMAR	CANAL ROAD	OTTAWA	ΙL	61350
MSD000742668	GE PLASTICS	PORT BIENVILLE INDUSTRIAL PARK	BAY ST. LOUIS	MS	39521
PRD090383860	CARBIBE GE PRODUCTS INC.	ZENO GANDIA PARK, RTE 120	ARECIBO	PR	00613
PRD090070459		PO BOX 9069	HUMACAO		00661
PRD090282757	CARIBE GE PRODUCTS, INC.	P.O. BOX 1430	JUANA DIAZ		00665
PRD090510793	GE CARIBE	P.O. BOX #377	PALMER		00721
PRD090492109	GE-PATILLAS	STATE ROAD #3 KM 122.9	PATILAS		00723
PRD000692590	GE CARIBE PRODUCTS INC., RIO PIEDES	CALLE LA BRISA #5 SABANA LLANA			00924
PRD091019224	CARIBE GE PRODUCTS INC.	P.O. BOX 186	SAN GERMAN		00753
PRD000692582	GE CARIBE PRODUCTS, INC. VIEQUES	P.O. BOX 187	VIEQUES		00765
TXD061382206	GE RAILCAR REPAIR SERVICES CORP.	P.O. BOX 115/TIFFON ROAD	RANGER	ТX	76470
VAD980551782	GE FANUC AUTOMATION NORTH AMERICA	RTE 29 NORTH AR RTE 606	CHARLOTTESVÍLLE	VA	22906
WVD980552384	GE SPECIALTY CHEMICALS, INC.		MORGANTOWN	w	26505
WVD088911854	GE PLASTICS - WOODMAR	STATE ROUTE 892 (PO BOX 68)	WASHINGTON	WV	26181
TOTAL FACILIT	IES: 14				

TOTAL FACILITIES: 88

OWNER/OPERATED FACILITIES

SCHEDULE B - CLOSURE POST CLOSURE (WHERE EPA IS ADMINISTERING)

03-26-1990 PAGE: 1

∤A ID#	FACILITY	STREET	CITY	ST		POST CLOS.	
						:=====================================	
CAD030584502	GE LOS ANGELES SERVICE CENTE	3601 E. LaPALMA AVENUE	ANAHE1M	CA	27248	0	27248
CAT000611095	GE ED & C	11115 VAN OWEN STREET	NORTH HOLLYW	CA	52400	0	52400
CAD009208075	GE SAN FRANCISCO SERVICE CTR	5441 E. 14TH STREET	OAKLAND	CA	31440	0	31440
CAD009542721	GE EMC/ONTARIO	1923 E. AVION STREET	ONTARIO	CA	35422	0	35422
CAD053914206	GE VALLERCITOS NUCLEAR CENTE	PO BOX 460	PLEASONTON	CA	155135	8400	163535
	****** ***** ***** ***** ***** *****				2222222222	22222222	********
	TOTAL STATE FACILITIES: 5		STATE TOTAL:		301645	8400	310045
CTD001453711	GE	1285 BOSTON AVENUE	BRIDGEPORT	СТ	744080	618320	1362400
CTD000842492	GE WASTEWATER SETTLING AREA	41 WOODFORD AVENUE	PLAINVILLE	СТ	2975272	1475989	4451261
					========	=========	
	TOTAL STATE FACILITIES: 2		STATE TOTAL:		3719352	2094309	5813661
IAD075836130	GE APPLIANCE CONTROL DEPARTM	1803 RADIANT ROAD	CARROLL	IA	10809	0	10809
IAD005272703	GE SWITCHGEAR OPERATIONS	510 AGENCY ROAD	W. BURLINGTO	IA	432363	21618	453981
IAD000678037	GE BURLINGTON BASKET COMPANY	1404-1418 WEST PLEASANT ST.	W.BURLINGTON	IA	0	1519600	1519600
					========	******	========
	TOTAL STATE FACILITIES: 3		STATE TOTAL:		443172	1541218	1984390
OHD000817312	GE AIRCRAFT ENGINES - EVANDA	1 NEUMANN WAY - MD N123	CINCINNATI	OH	377760	0	377760
OHD000817304	GE ACSC/C	1350 TENNESSEE AVE.	CINCINNATI	OH	37125	0	37125
OHD074713561	GE CINCINNATI SERVICE CENTER		CINCINNATI	OH	6485	0	6485
OHD009101494	GE ACSC/C	333 W. SEYMOUR AVENUE	CINCINNATI	OH	12966	0	12966
OHD048433080	GE CHEMICAL PRODUCTS	1099 IVANHOE ROAD	CLEVELAND	ОН	1156280	0	1156280
OHD048432975	GE EUCLID SPECIALTY	1133 E. 152ND STREET	CLEVELAND	CH	405538	0	405538
OHD004302428	GE COSHOCTON PLANT	1350 SOUTH SECOND STREET	COSHOCTON	OH	118045	0	118045
OHD004227369	GE LIGHTING - TUNGSTEN PRODU	21800 TUNGSTEN ROAD	EUCLID	OH	180588	0	180588
OHD000721456	GE ACSC/C	3024 SYMMES RD.	HAMILTON	ОН	19819	0	19819
OHD048111090	JEFFERSON WELD PLANT	85 W. ASTUBULA	JEFFERSON	OH	126000	0	126000
OHD004176046		403 N. MAIN STREET	NILES	OH	45099	0	45099
	GE RAVENNA LAMP	6800 N. CHESTNUT STREET	RAVENNA	OH	30265	0	30265
	GE OHIO LAMP	1210 N. PARK AVENUE	WARREN	OH	9 5001	0	95001
	GE TRUMBULL LAMP	1313 W. MARKET STREET	WARREN	OH	18276	0	18276
2000045501/1	GE YOUNGSTOWN LAMP	40 HUGHES STREET	YOUNGSTOWN	OH	5405 ========	0	\$405
	TOTAL STATE FACILITIES: 15		STATE TOTAL:		2634652	0	2634652
					=========	=========	
	TOTAL OWNER/OPERATED FACILITI	ES: 25	TOTAL:		7098821	3643927	10742748

GUARANTEED FACILITIES

03-26-1990

SCHEDULE B - CLOSURE POST CLOSURE (WHERE EPA IS ADMINISTERING)

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\ ID#	FACILITY	STREET	CITY	ST	CLOSURE	POST CLOS.	TOTAL
-:	:=====================================	:=====================================		====	********	=======================================	
PRD090383860	CARBIBE GE PRODUCTS INC.	ZENO GANDIA PARK, RTE 120	ARECIBO	PR	120520	0	120520
PRD090070459	GE CARIBE	PO BOX 9069	HUMACAO	PR	47160	0	47160
PRD090282757	CARIBE GE PRODUCTS, INC.	P.O. BOX 1430	JUANA DIAZ	PR	49413	0	49413
PRD090510793	GE CARIBE	P.O. BOX #377	PALMER	PR	864726	0	864726
PRD090492109	GE-PATILLAS	STATE ROAD #3 KM 122.9	PATILAS	PR	1941304	0	1941304
PRD000692590	GE CARIBE PRODUCTS INC., RIO	CALLE LA BRISA #5 SABANA LL	RIO PIEDRAS	PR	71339	0	71339
PRD091019224	CARIBE GE PRODUCTS INC.	P.O. BOX 186	SAN GERMAN	PR	42077	٥	42077
PRD000692582	GE CARIBE PRODUCTS, INC. VIE	P.O. BOX 187	VIEQUES	PR	66024	262000	328024
					22222222	========	=========
	TOTAL STATE FACILITIES: 8		STATE TOTAL:		3202563	262000	3464563
	•				E222222	=========	********
	TOTAL SUMMARY	: 8	TOTAL:		3202563	262000	3464563

SUMMARY

03-26-1990

SCHEDULE B - CLOSURE POST CLOSURE (WHERE EPA IS ADMINISTERING)

PAGE: 3

TOTAL ALL FACILITIES: 33 SUM OF ALL C/PC ESTIMATES: 10301384 3905927 14207311



Corporate Environmental Programs General Electric Company 3135 Easton Turnpike, Fairfield, CT 06431

March 15, 1990

Letter from Chief Financial Officer to Demonstrate Both Liability Coverage and Assurance of Closure or Post Closure

U.S. EPA Region V 230 South Dearborn Chicago,IL 60604

I am the chief financial officer of the General Electric Company, 1 River Road, Schenectady, New York 12345. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The firm identified above is the owner or operator of the following facilities for which liability coverage for both sudden and nonsudden accidental occurrences is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265: See SCHEDULE A.

The firm identified above guarantees, through the guarantee specified in Subpart H of 40 CFR Parts 264 and 265, liability coverage for both sudden and nonsudden accidental occurrences at the following facilities owned or operated by the following: SEE SCHEDULE A. The firm identified above is the direct parent corporation of the owner or operator.

- 1. The firm identified above owns or operates the following facilities for which financial assurance for closure or post-closure care or liability coverage is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: SEE SCHEDULE B.
- 2. The firm identified above guarantees, through the guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care or liability coverage of the following facilities owned or operated by the guaranteed party. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: SEE SCHEDULE B.

- 3. In states where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this firm is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure or post-closure cost estimates covered by such a test are shown for each facility: SEE SCHEDULE C.
- 4. The firm identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanisms specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanism. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None
- 5. This firm is the owner or operator of the following UIC facilities for which financial assurance for plugging and abandonment is required under Part 144. The current closure cost estimates as required by 40 CFR 144.62 are shown for each facility:

 None

This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year ended December 31, 1989.

Part B. Closure or Post-Closure Care and Liability Coverage.

Alternative II

1.	Sum of current closure and post-closure cost estimates (total of <u>all</u> cost estimates listed above)	(Dollars in thousands)	
		\$ <u>45,214</u>	
2.	Amount of annual aggregate liability coverage to be demonstrated	\$ <u>27,000</u>	
3.	Sum of lines 1 and 2	\$ <u>72,214</u>	

Page Three

4.	Current bond rating of most recent issuance and name of rating service	Aaa - Moo AAA - Sta	<u>ody's</u> andard & Poor's
5.	Date of issuance of bond	11/7/88	
6.	Date of maturity of bond	12/27/92	
7.*	Tangible net worth (if any portion of the closure or post-closure cost estimates is included in "total liabilities" on your financial statements, you may add that portion to this line)	\$ <u>12,068,0</u> (<u>00</u>
8.*	Total assets in the U.S. (required only if less than 90% of assets are located in the U.S.)	NOT API	PLICABLE
9.	Is line 7 at least \$10 million?	YES X	<u>NO</u>
10.	Is line 7 at least 6 times line 3?	<u>X</u>	<u></u>
11.*	Are at least 90% of the assets located in the U.S.?	<u> </u>	
12.	Is line 8 at least 6 times line 3?	<u>X</u>	

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.

Senior Vice President - Finance March 15, 1990

EXPLANATION OF COST ESTIMATES ADJUSTED DIFFERENT FROM INFLATION FACTOR

CAT000611095 CAD053914206 CAD000819680 CAT000613471 GAD003308145	I G G	REVISED CLOSURE PLAN TO REFLECT INCREASED COSTS 1-CHANGES IN CLOSURE SCOPE; 2-ANTICIPATION OF RE-LICENSING, LICENSE CHANGES TSD FACILITY OFFICIALLY CLOSED IN 1989.
CAD053914206 CAD000819680 CAT000613471	I G G	1-CHANGES IN CLOSURE SCOPE; 2-ANTICIPATION OF RE-LICENSING, LICENSE CHANGES
CAD000819680 CAT000613471	G G	
CAT000613471	G	
	_	
GAD003308145	_	GENERATOR STATUS IN 1989
	P	THE 1988 EST. WAS RECALCULATED AT GEORGIA'S REQUEST USING THEIR INFLATOR FACTOR.
ILD005453691	I	REVISED FOR SUBMISSION OF INTERIM STATUS CLOSURE
IND006040299	N	CLOSURE PLAN SUBMITTED TO STATE. PENDING. LOW COST ESTIMATE FROM ENGINEER
KYD006387021	C	GENERATOR STATUS PER STATE CERTIFICATION LETTER DATED 3/21/89 (M. ALAUDDIN).
MID050676622	1	CLOSED/REMEDIATED. AWAITING APPROVAL
NCD003237948	P	REVISED CLOSURE PLAN TO REFLECT ADDITIONAL COSTS FOR REMEDIAL ACTION SYSTEM.
NCD050409150	Þ	RE-CALCULATED ESTIMATE TO REFLECT LOCALLY AVAILABLE LABOR & MATERIAL COSTS.
NYD002084135	I	PART B SUBMITTED TO MY STATE. CHANGED EST. PER DEC COMMENTS PART B APPLICATION.
NYD071094197	I	REVISED AS PART OF ONGOING PERMIT APPLICATION WITH NEW YORK STATE.
NYD066832023	P	FACILITY 95% CLOSED. REVISED CLOSURE PLAN TO SHOW REMAINING COSTS
NYD002080034	P	CLOSURE COSTS FOR INCINERATORS AND TANKS WERE UPDATED, ADDED NEW LANDFILL
OHD000817304	i	EST. RE-CALCULATED IN 1989 TO ACCT. FOR ADDITION OF SECOND AREA TO BE CLOSED.
OHD000721456	1	ESTIMATE SUBMITTED LAST YEAR WAS IN ERROR (i.e. overinflated)
OHD048111090	M	ADDITION TO RCRA FA 1989 LIST PER CONSENT ORDER - SOLD 1987
PAD003026903	M	SOLD 7/87
PRD090306077	G	GENERATOR STATUS PER "COMMONWEALTH" LETTER DATED 9/28/89 (S. BATANCOURT)
SCD067002147	P	ESTIMATE REVISED DUE TO CHANGE IN GROUND WATER SAMPLING METHODS.
TXD079400545	G	GENERATOR REGISTRATION DATED 3/88
TXD061382206	С	RCRA CLOSURE COMPLETED 7/89 - NOT YET CERTIFIED.
VAD003132255	G	FACILITY CERTIFIED CLOSED IN ACCORDANCE WITH STATE APPROVED CLOSURE PLAN.
VAD070360219	I	ESTIMATE IN ACCORDANCE WITH REVISED CLOSURE PLAN APPPROVED BY VIRGINIA AUG. 1989
WAD046207379	S	FACILITY SOLD. ISDF STATUS UNKNOWN.
WID000808717	G	TSD FACILITY OFFICIALLY CLOSED IN 1989.
WID006121354	G	TSD FACILITY OFFICIALLY CLOSED IN 1989.
WID006121347	ī	STORAGE NO LONGER USED. TANKS REMOVED
WID000808725	G	TSD FACILITY OFFICIALLY CLOSED IN 1989.

Total Facilities: 30

OWNER/OPERATED FACILITIES

03-26-1990

SCHEDULE C - CLOSURE POST CLOSURE (WHERE EPA IS NOT ADMINISTERING)

PAGE: 1

A ID#	FACILITY	STREET	CITY	ST		POST CLOS.	
######################################	*======================================			222E	**********		*********
ALD981026677	GE PLASTICS-BURKVILLE OPERAT	ONE PLASTICS DRIVE	BURKVILLE	AL	46555	O	46555
				~-	********	T=======	**************************************
	TOTAL STATE FACILITIES: 1		STATE TOTAL:		46555	0	46555
FLD001690924	GE SIMULATED & CONTROL SYSTE	1800 VOLUCIA AVENUE	ĎAVTONA READ		200/0	_	
120001090924	GE STROERTED & CONTROL STATE	1000 VOLUSIA AVENUE	DAYTONA BEAC	FL	20960	0	20960
	TOTAL STATE FACILITIES: 1		STATE TOTAL:		20960	0	20960
						•	20700
GAD003308145	GE MEDIUM TRANSFORMER OPERAT	1075 DEAMOUN CIRCLE	DOME		27/400	_	
470003300143	SE FIED TON TRANSFORMER OFERAT	1933 KEDMOND CIRCLE	ROME	GA	236100	0	236100
	TOTAL STATE FACILITIES: 1		STATE TOTAL:		236100	0	236100
						·	230100
110005453691	GE GENERAL PURPOSE CONTROLS	1601 GE ROAD	BLOOMINGTON	1L	92580	0	
1LD070015714	GE SERVICE SHOP - CHICAGO	6045 SOUTH NOTTINGHAM	CHICAGO	IL	10809	0	92580 10809
1LD980503023	GE	1540 S. 54TH AVENUE	CICERO	IL	38912	19456	58368
1LD005443866	GE MATTON LAMP	1501 S. 19TH STREET	MATTON	IL	23312	0	23312
ILD062338694	GEIPS - MORRIS PLANT	7555 E. COLLINS ROAD	MORRIS	IL	92224	0	92224
1LD005272992	GE APPLIANCE CONTROLS	709 W. WALL STREET	MORRISON	IL	209600	0	209600
					######################################	=========	=======================================
	TOTAL STATE FACILITIES: 6		STATE TOTAL:		467437	19456	486893
IND000803726	GE BLOOMINGTON PLANT OPERATI	301 NORTH CURRY PIKE	BLOOMINGTON	IN	84784	. 0	84784
IND004557815	GE SPECIALTY TRANSFORMER OPE	1701 COLLEGE STREET	FORT WAYNE	1N	47160	0	47160
	GE GENERAL PURPOSE MOTOR (AN	2000 TAYLOR STREET	FORT WAYNE	IN	20960	0	20960
	GENERAL ELECTRIC COMPANY	12TH ST. SE. P.O. BOX 657	LINTON	IN	23600	0	23600
IND006376362	GE PLASTICS	LEXAN LANE	MT. VERON	IN	39129	0	39129
	TOTAL STATE FACILITIES: 5		CTATE TOTAL		245/72	**********	PECESEZZZZ
	·		STATE TOTAL:		215633	0	215633
KSD041917501	CE.AENC	STRATUSE FIRE	48444444		***		
K3D041711301	de-Aenc	STROTHER FIELD	ARKANSAS CIT	KS	28540	0	28540
	TOTAL STATE FACILITIES: 1		STATE TOTAL:		28540	0	
	,		JIAIL TOTAL.		20340	U	28540
~vn004707034	OF ADDITANCE BANK						•
		APPLIANCE PARK 26-101	LOUISVILLE	KY		0	•
K10014041330	GE AIRCKAFT ENGINES	US HIGHWAY 41A ROUTE 2	MADISONVILLE	KY		0	194928
	TOTAL STATE FACILITIES: 2		STATE TOTAL:		194928	0	
			· ·		. 174720	·	174720
LAD053782413	GE NEW ORLEANS SERVICE CENTE	1115 RAADMAG CYDEET	NEU ORI FANO		*8/5*	_	
	HER ANTENNO SEKAIPE CERIE	FIZZATE CHMMAN STATE	NEW ORLEANS	LA		0	
	TOTAL STATE FACILITIES: 1		STATE TOTAL:		19456	.0	
			with the second		17730	Ų,	17470

OWNER/OPERATED FACILITIES

SCHEDULE C - CLOSURE POST CLOSURE (WHERE EPA IS NOT ADMINISTERING)

:월 : 2

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10#	FACILITY	STREET	CITY		CLOSURE	POST CLOS.	TOTAL
MDD046279311	GE APPLIANCE PARK-EAST	9001 SNOWDEN RIVER PARKWAY	COLUMBIA	MD	0	2339418	2339418
	TOTAL STATE FACILITIES: 1		STATE TOTAL:		0	2339418	2339418
MND980501407	GE MINNEAPOLIS SERVICE CENTE	2025 49TH AVENUE NORTH	MINNEAPOLIS	MN	12971	0	12971
	TOTAL STATE FACILITIES: 1		STATE TOTAL:		12971	0	12971
	GE MOTORS - SPRINGFIELD	E.SUNSHINE	SPRINGFIELD	MO	24590	0	24590
MODUU6312375	GE ST. LOUIS LAMP	6251 ETZEL AVENUE	ST. LOUIS	MO	37832	0	37832
	TOTAL STATE FACILITIES: 2		STATE TOTAL:		62422	0	62422
NCD003237948	GE HICKORY TRANSFORMER PLANT GE NUCLEAR FUEL & COMPONENT		HICKORY	NC	33700	5277000	5310700
HCD030407130	GE NOCLEAR FUEL & COMPONENT	CASTLE HAYNE RD. MC J26	WILMINGTON	NC	89515	0	89515
	TOTAL STATE FACILITIES: 2		STATE TOTAL:		123215	5277000	5400215
NYD093256063	GE CAPACITOR & POWER PROTECT	381 UPPER BROADWAY	FORT EDWARD	NY	530619	0	530619
NYD002080075 NYD002084135	GE CAPACITOR & POWER PROTECT GE	JOHN STREET	HUDSON FALLS	NY	232078	0	232078
NYD071094197	GE CORPORATE RESEARCH & DEVE	1 RIVER ROAD, BUILDING 41-1		NY	1273642	0	1273642
NYD066832023	GE PLASTICS - SELKIRK OPERAT	NORYL AVENUE	SCHENECTADY SELKIRK	NY NY	682606	0	682606
NYD059385120	GE ELECTRONICS PK, BG 7 CHEM	_		NY	394084 46189	147533 0	541617
NYD067539940	GE BUFFALO SERVICE CENTER	175 MILENS ROAD	TONAWANDA	NY	319103	0	46189 319103
NYD000521971	GE AEROSPACE ELECTRONIC SYST	FRENCH ROAD	UTICA	NY	20960	0	20960
NYD002080034	GE SILICONE PRODUCTS DIVISIO	260 HUDSON RIVER ROAD	WATERFORD	NY	11967361	2267100	14234461
	TOTAL STATE FACILITIES: 9		STATE TOTAL:		15466642	2414633	17881275
SCD067002147	GE MEDICAL SYSTEMS	3001 WEST RADIO DRIVE	FLORENCE	sc	146628	1248168	1394796
	TOTAL STATE FACILITIES: 1		STATE TOTAL:		146628	1248168	1394796
TXD064114242	GE DALLAS SERVICE CENTER	3202 MANOR WAY	DALLAS	ТX	10809	0	10809
TXD060718269	GE HOUSTON SERVICE CENTER	8800 WALLISVILLE ROAD	HOUSTON	ΤX	363561	0	363561
·					======	========	========
	TOTAL STATE FACILITIES: 2		STATE TOTAL:		374370	O	374370
	GE MOBILE COMMUNICATIONS GE WINCHESTER LAMP	MOUNTAIN VIEW ROAD	LYNCHBURG	VA	79124	0	79124
440010300519	OF MINCHESIER FULL	ROUTE 3, PO BOX 310	WINCHESTER	VA	61410	0	61410
	TOTAL STATE FACILITIES: 2		STATE TOTAL:		140534	0-	140534

OWNER/OPERATED FACILITIES

SCHEDULE C - CLOSURE POST CLOSURE (WHERE EPA IS NOT ADMINISTERING)

03-26-1990 PAGE: 3

'A ID# FACILITY ST CLOSURE POST CLOS. TOTAL STREET CITY VTD002083434 GE ARMAMENT SYSTEMS DEPARTME LAKESIDE AVENUE BURLINGTON VT 50687 EEEEEEEE EEEEEEE 222222 TOTAL STATE FACILITIES: 1 50687 0 STATE TOTAL: 50687 WAD009278706 GE GEAE SCMC/SEATTLE 220 SOUTH DAWSON STREET SEATTLE WA 36474 36474 E35522225 E5522222 \$55242222 TOTAL STATE FACILITIES: 1 STATE TOTAL: 0 36474 TOTAL OWNER/OPERATED FACILITIES: 40 TOTAL: 17643552 11298675 28942227

GUARANTEED FACILITIES

SCHEDULE C - CLOSURE POST CLOSURE (WHERE EPA IS NOT ADMINISTERING)

03-26-1990

PAGE: 4

ID#	FACILITY	STREET	CITY		CLOSURE	POST CLOS.	
*************	********************	;=====================================		::::	=======================================	2222222222	
ILD079135133	GE PLASTICS - LINMAR	CANAL ROAD	OTTAWA	ΙL	36274	0	36274
	TOTAL STATE FACILITIES: 1		STATE TOTAL		7/77/	··	*********
•	TOTAL STATE TROITETTES. 1		STATE TOTAL:		36274	0	36274
MSD000742668	GE PLASTICS	PORT BIENVILLE INDUSTRIAL P	BAY ST. LOUI	MS	151430	0	151430
	TOTAL CTATE FACILITIES. 4	·			=========	E========	=========
	TOTAL STATE FACILITIES: 1		STATE TOTAL:		151430	0	151430
TXD061382206	GE RAILCAR REPAIR SERVICES C	P.O. BOX 115/TIFFON ROAD	RANGER	TX	1000000	524000	1524000
					*********	=========	
	TOTAL STATE FACILITIES: 1		STATE TOTAL:		1000000	524000	1524000
VAD980551782	GE FANUE AUTOMATION NORTH AM	RTE 29 NORTH AR RTE 606	CHARLOTTESVI	VA	161400	G	161400
				•••	=========	********	*========
	TOTAL STATE FACILITIES: 1		STATE TOTAL:		161400	٥	161400
WVD980552384	GE SPECIALTY CHEMICALS, INC.	1000 DUPONT ROAD BUILDING R	MORGANTOLN	wv	156383	o	156383
WVD088911854		STATE ROUTE 892 (PO BOX 68)		WV	34578	n	34578
		•			*=======	========	24270
	TOTAL STATE FACILITIES: 2		STATE TOTAL:		190961	0	190961
					=========	*=======	22222222
	TOTAL SUMMARY	: 6	TOTAL:		1540065	524000	2064065

SUMMARY

03-26-1990

SCHEDULE C - CLOSURE POST CLOSURE (WHERE EPA IS NOT ADMINISTERING)

PAGE: 5

********* ******* ********

TOTAL ALL FACILITIES: 46

SUM OF ALL C/PC ESTIMATES:

19183617



Certified Public Accountants

Stamford Square 3001 Summer Street Stamford, CT 06905

March 15, 1990

Mr. Dennis D. Dammerman Senior Vice President - Finance General Electric Company 3135 Easton Turnpike Fairfield, CT 06431

Dear Mr. Dammerman:

We have applied certain agreed-upon procedures, as discussed below, with respect to Part B of your letter on behalf of General Electric Company to the Environmental Protection Agency dated March 15, 1990. It is understood that these procedures were performed solely to assist you in connection with filing the above mentioned letter, and our report is not to be used for any other purpose. Our procedures and findings are as follows:

- The dollar amount of tangible net worth included under item 7, Part B, letter page three We compared the dollar amount of tangible net worth, which represents total share owners' equity less total intangible assets, to the difference between amounts shown on the "Statement of Financial Position" Page 28 of the Company's 1989 Annual Report for total share owners' equity and intangible assets and found them to be in agreement.
- To determine that the "Not Applicable" response to item 8, Part B, letter page three, and the positive response to item 11, Part B, letter page three were correct, we compared the amount of United States assets included in the geographic segment information disclosed in Note 34 on Page 68 of the Company's 1989 Annual Report to the product of 90% times total assets as shown on the "Statement of Financial Position" Page 28 of the Company's 1989 Annual Report and found that the dollar amount of assets in the United States was greater than the result of the computation described above.

Because the above procedures do not constitute an audit made in accordance with generally accepted auditing standards, we express no opinion on any of the items referred to above. In connection with the procedures referred to above, no matters came to our attention that caused us to believe that the specified amounts or items should be adjusted. Had we performed additional procedures, matters might have come to our attention that would have been reported to you. This report relates only the amounts and items specified above and does not extend to any financial statements of General Electric Company and consolidated affiliates taken as a whole.

Very truly yours,

KPM6 Peut Marunh



y, y, sx, FAD, 355



State of Ohio Environmental Protection Agency

O. Box 1049, 1800 WaterMark Dr. Jolumbus, Ohio 43266-0149

Financial Record Review



June 31, 1987

Re: General Electric OHD000721456/05-09-0374~ OHD000817304/05-31-0376~ OHD000817312/05-31-0305-OHD004176046/02-78-0163-OHD004224960/02-78-0164-OHD004226171/02-50-0154~ OHD004227369/02-18-0167-OHD004302428/04-16-0024 * OHD009101494/05-31-0375~ OHD048111090/02-04-0161-OHD048432915/02-18-0176-0HD048433080/02-18-0168 -3 OHD059061317/02-67-0158-14 OHD066052804/02-78-0153 - Richard F. Celeste Governor

Dennis D. Dammerman Senior Vice President-Finance General Electric Company 1 River Road Schenectady NY 12345

Dear Mr. Dammerman:

I have received General Electric's financial test for fiscal 1986 submitted to this agency in order to demonstrate compliance with Ohio rules which require financial responsibility for closure and post-closure costs and liability coverage from hazardous waste treatment, storage or disposal facilities.

My review of the documents reveals that they are acceptable evidence of compliance with these requirements.

Therefore, the facilities referenced above have met the financial responsibility requirements of Ohio's hazardous waste rules.

If you have any questions, please contact me at (614)481-7234.

Sincerely,

David Mentzer

S&E Section, DSHWM

DM/drr

cc: Mike Savage, CO
Dave Wertz, NEDO
Don Marshall, SWDO
Ken Dewey, SEDO
RF

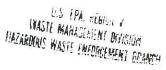
GENERAL 🍪 ELECTRIC

Letter from Chief Financial Officer to Demonstrate
Liability Coverage or to Demonstrate Both Liability Coverage
and Assurance of Closure or Post-Closure Care

March 27, 1986

Ad

Regional Administrator EPA Region V 230 South Dearborn Street Chicago, IL 60604



I am the chief financial officer of the General Electric Company, 1 River Road, Schenectady, New York 12345. This letter is in support of this firm's use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265: See Schedule I

- 1. The owner or operator identified above owns or operates the following facilities for which financial assurance for closure or post-closure is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: See Schedule II
- 2. The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: See Schedule III
- 3. In states where EPA is not administering the financial requirements of Subpart H of 40 CFR parts 264 and 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test or guarantee are shown for each facility: See Schedule IV

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MAR 3 1 1986

U. S. EPA REGION 5 OFFICE OF REGIONAL AGGREGATION 4. The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure, or if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None

This owner or operator is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1985.

Part B. Closure or Post-Closure Care and Liability Coverage.

Alternative II

		(Dollars in thousands)
1.	Sum of current closure and post-closure cost estimates (total of <u>all</u> cost estimates listed above)	\$ <u>46,076</u>
2.	Amount of annual aggregate liability coverage to be demonstrated	\$8,000
3.	Sum of lines 1 and 2	\$54,076
4.	Current bond rating of most recent issuance and name of rating service	Aaa - Moody's AAA - Standard & Poor's
5.	Date of issuance of bond	May 1974
6.	Date of maturity of bond	May 2004
* 7.	Tangible net worth (if any portion of the closur or post-closure cost estimates is included in "total liabilities" on your financial statements you may add that portion to this line)	
		T
* 8-	Total assets in the U.S. (required only if less than 90% of assets are located in the U.S.)	\$ 22,733,000

GENERAL 🍪 ELECTRIC

Page Three

		YES	<u>NO</u>
9.	Is line 7 at least \$10 million?	<u>x</u>	
10.	Is line 7 at least 6 times line 3?	<u>x</u>	_
	Are at least 90% of assets located in the U.S.? If not, complete line 12		_ <u>x</u>
12.	Is line 8 at least 6 times line 3?	X	

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264151(g) as such regulations were constituted on the date shown immediately below.

GENERAL 🍪 ELECTRIC

Page Four

Dennis D. Dammerman Senior Vice President-Finance March 27, 1986

	CLOSURE	POST-CLOSURE	
SCHEDULE II	16359	7714	•
SCHEDULE III	1278	0	
SCHEDULE IV	17423	3302	į
207257725775	=======================================		
TOTAL	35060	11016	
GRAND TOTAL FOR CLOSURE AND/OR POST-CL	.OSURE	46076	

SCHEDULE I

REGION	EPA ID	LOCATION	STREET	ZIIZ	SIAIE	ZIP	
ā	CTD000842492	DISTRIBUTION EQUIPMENT DIV.	SENT ST.	PLAINVILLE	5	06062	
į	CTD001453711	BRIDGEPORT AREA RELATIONS OPR.	1285 BOSTON AVENUE	BRIDGEPURI	<u>ۃ</u> 5	00000	
	MED051431906	DISTR EQMT - CIRCUIT PROT	RODMAN KOAD	AUBUKN AUBUKN	¥ 5	05401	
	VTD002083434		LAKESIDE AVENUE	BURLING ON	- r	07047	
02	NJD003918570	NEW YORK SERVICE SHOP	6001 TUNNELLE AVENUE	NOKIN BERGEN	2 }	14843	
	NYD002080034	SILICONE PRODS DIV	COUNTY STORET	MIDCON FALL	· >	12839	
	NYD002080075	CAPACITUR TRADS UPI	d June Sirke	COURNICTARY	<u> </u>	12345	
	NYD002084135	SCHENECTADY UTILITIES UP		ALIGISON	<u> </u>	13021	
	NYD002231272	SEMICONDUCTOR PRODS DPT	M GENESEE SI KOAD	ACEURAN CARY	2 3	13790	
	NYD002235182	AERO CONTROL SYS DPT	600 MAIN STREET	CUMESON CITY	- >	12745	
	NYD052987096	ELECTROMATERIALS BUS DEPT	1 CAMPBELL KOAD	SCHENELIADI	2	1215R	
	NYD066832023	MORYL PRODUCTS DIVISION	MURTL AVENUE	TONALLANDA	>	14150	
17	MYD067539940	BUFFALO SERVICE SMUP	DIVED BOAD	NTSKAYUNA	ž	12309	
	1819601100AN	CABACTTOR BENCH ABT	7125 RECADMAY	FORT EDWARD	¥	12828	
	MTD093236063	CAPACATOR PRODUCTION OF TAXABLE PRODUCTION O	ROUTE 993 BARRIO	VIEQUES	<u>a</u>	00765	
	78000000000000000000000000000000000000	CENERAL ELECTRIC	A BRISA NO 5	RIO PIEDRAS	æ	00924	
	PRUDUUDD 72370	GENERAL ELECTRIC	STATE RD 3 K 82	HUMACAD	<u>8</u>	00762	
	C2100000000	CENEDAL FLETTET	KM 67 CARRETARA 149	JUANA DIAZ	<u>a</u>	00665	
	FE0302020000	GENERAL FIECTRIC	EL TUDUE INDT PARK	PONCE	æ	00731	
	PR065030867	CEMEDAL FLECTION	PT 129, KM41	ARECIBO	ď	00612	
,	PR0030303000	CENEDAL ELECTRIC	P.O. BOX 968	PATILLAS	æ	00723	
,		GENERAL ELECTRIC	POLITE 191 KM 5	PALMER	3	00721	
	PK0070310733	CEMEDAL ELECTRIC	EL RETIRO IND PRK	SAN GERMAN	9	00745	
ç	112010100000	OPFRATION	APPLIANCE PARK EAST	COLUMBIA	웊	21045	
2		COLUMNIA & C.	230 GODDARD BLVD.	KING OF PRUSSIA	Ą	19406	
	040005033055	TOANS SYST BIS OPS	2901 EAST LAKE ROAD	ERIE	Ā	16531	
	80606440040	TEAMS SYS RUS OPS	INDUSTRIAL DRIVE	GROVE CITY	Ā	18127	
		REPORTED TO ASS PLANT	MAYER STREET	BRIDGEVILLE	Ą	15017	
		MORTIF COM RIS DPT	MOUNTAIN VIEW ROAD	LYNCHBURG	>	24502	
		CINCARCITO AMP PLANT	ROUTE 3 BOX 310	WINCHESTER	\$	22601	
		INDISTRIBL CONTROL DEPARTMENT	ROUTE 29N AT TR 6066	CHARLOTTESVILLE	\$	22901	
90	41 098060035	PLACTICS BUSINESS OP	ROUTE 1 BOX 21	BURKVILLE	٦	36725	
5	FL 0001690924	SIMULATION & CNTL SYS DPT	1800 VOLUSIA AVENUE	DAYTONA	7	32105	
	FI DO43860451	RATTERY BUS DPT	HIGHWAY 441 NORTH	GAINESVILLE	4	32602	
	GAD003308145		REDMOND CIRCLE	ROME	3	30161	
	KYD006387021	MA MANUFACTURING DIV	APPLIANCE PARK BLDG	LOUISVILLE	∑ :	4230	
		AEBG	US HIGHWAY 41A	MADISONVILLE	<u>.</u>	42431	
	MCD003237948	DIST TRANS BUS DPT	FAIRGROVE CHURCH RD	HICKORY	ž ;	26403	
		NUCLEAR ENERGY BUS OF	CASTLE HAYNE	MICHINGION	ء ج	20501	
	SCD067002147	MOBILE COMM BUS DIV	JODI W WADIO DRIVE	MODICION	3 2	37814	
	TND066709130		CASI MURKIS BLVD	CEL MED	: ≓	38375	
;		DISTRIBUTION EQM: DIV	JOS UEST DALL STORET	MODELSON	: :	60644	
ç	7.500277587		JAN S 19TH STREET	NO LL YX	H	61938	
	11.0001443600 1.0001413600	CAMERA SUPPOSE CONTROL DEPT	VETEDANG BADKUAY	BLOOMINGTON	ᆏ	61701	•
	169664679711	CEREMAL FURNOSE COMINCE DEFI	2555 FACT COLLINS RD		1	60450	
	11,005,338894 T1,0070015714	CHICAGO SERVICE OFERNITOR	6045 S NOTTINGRAM AV		ដ	60638	
	T. DOBOGO 3024	CHICAGO SERVICE SHOP	S 54TH		ı	60650	
	######################################	MADES ATTLEMENTED DIV		BLOOMINGTON	Z	47402	
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71175		FORT WAYNE	DECATOR	PUK! WATRE	LINIUN			MARREN	RIVERVIEW	MINNEAPOLIS	MAMT! TON	CTACTEMATT	TATE OF THE PARTY	EVERBALE NT: CO			FILE TO			NUSCEEDEN	CI FVFI AND	CITATION OF THE PARTY	DAVENNA	CADDEN	TINUTURAL	F CI EVEL AND	JONESBORD	SHREVEPORT			DALLAS	_	_		CARROLL	ARKANSAS	SI LUGIS		RANCHO CORDOVA	DAKLAND			SUNOL	CHINO	N HOLLYWOOD	CAN JOSE	1777 だだり	PORTLAND
SIREET	1	1701 COLLEGE STREET	500 NORTH 9TH SIKEE	2000 TAYLOR STREET	TWELFTH STREET SE	LEXAN LANE	13TH & PAYNE STREETS	11177 E 8 MILE ROAD	19704 KRAUSE STREET	2025 AGTH AVENUE N	TOTAL CONTROL TOTAL	SUCA STREET ASS	1500 TERRESSEE AVE	1/5 NEUTANN WAT	ACC M MALN SINCE	TOTAL MAKKET STREET	AU HUGHES SIREE!	TIBER PRODUCT OF STATE	135U S SECOND SINEER	SECTION NET	1111 F 1510 CTOURT	1000 TVANADE BOAD	COOD A CURCTAINT OF	SASO A CAESTROL SI	SEC CIDA PARA AVENUE	MELA DADY MODEL DO	INTER PARK, RUBEL NO.	ZOOG EL SINCE!	1115 DE ARMAS STREET	ARDO WALLISVILLE RD	3202 HANDR WAY	3530 W 12TH STREET	1404/18 W MT PLEASAN	510 AGENCY ROAD	1803 RADIANTNCY	STROTHER FIELD		AGGO VINCETON CT	CECUPITY		ONTABIO INTL AIRPORT	3601 E LA PALMA ST	6705 VALLECITOS RD		11115 VANOMEN ST		1/3 CUKINER	2227 NW 29TH AVE
LOCATION		SPECIALTY TRANSF DPT	GENL PURPOSE MOTOR OPT	GENT PURPOSE MOTOR DPT	GENERAL PURPOSE MTR DEPT	LEXAN PRODUCTS DIVISION	SPECIALTY MOTOR DEPT	CABBOLINY CYCTEMS NOT	ANTOCIC CICIC CIC	THE WOLL SERVICE SHOP	MINNEAPOLIS SERVICE SHOP	AVIATION SERVICE DEPARTMENT	AVIATION SERVICE DEPARTMENT	AEBG	NILES GLASS PLANT	TRUMBULL LAMP PLANT	YOUNGSTOWN LAMP PLANT	REFR HETALS PROD DF	ELECTROMATERIALS BUS DEPT	AVIATION SERVICE DEPARTMENT	JEFFERSON WELD PLANT	LIGHTING REL & UPS	CHEMICAL PRODUCTS PLANI	RAVENNA LAMP PLANT	OHIO LAMP WARREN	CINCINNATI SERVICE SMUP	NELA PARK FACILITY	SPECIALLY MOIOR DEPARIMENT	DISTR TRANS BUS UP!	MEM UNIEANS SERVICE SHOP	DOUGLON SERVICE SHOP	DALLES SERVICE SISS	POLICE DE IVERY	SUTTCHGEAR BUSINESS DEPT	APPLIANCE CONTROL DEPARTMENT	AVIATION SERVICE DEPARTMENT	ST LOUIS LAMP PLANT			MEDICAL SYSTEMS BUSINESS UPS						_		NUCLEAR ENERGY REL & UTIL
EPA ID		TND004557815		TADOOSAARAR	TM0006040299	TMD006376362	THU00639273	CCAATCAACCA.	C7++C7++001H	MID050616622	MNT280010398	OHD000721456	OHD000817304	OHD0000817312	DHD004176046	OHD004224960	OHD004226171	OHD004227369	OHD004302428		OHD048111090	OHD048432975	OHD048433080	OHD059061317	OHD066052804	DHD074713561	OHO085240133	ARD007037823	LAD043197284	LAD053782413	TXD060/18269	1X00304014242	1 ADD 79400943	TADO06676537	TAD075836130	KS0041917501	M00006312375	H00030709539	C00062753702	CAD000819680	CAD009208075	CAD009542721	CAD030584502	CAD033914200	CAU980616517	CA1000011033	CATACACI 2471	CAT000613471
REGION	NAME OF THE PERSON																											90					C	>			3		80	60								:

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PCLOSURE85		480	0	3394	0	0	•	0	•	3840	0	0	0	•	0	0	0	•		0	0	0	0	0	0	0	0	0	0	9	9	•	5 1	0 (•	•	0	0	0	0	0	0	0	2214 GOODG (Tot BEI DEIDERS)	
CLOSUREBS	1032	195	17	9830	215	319	127	9	242	4 41	103	160	451	9	7	س	_	_	52	38	16	51	148	104	~	61	347	983	22	~	6 5	182	200	£6.	*	25	16	21	91	69	~	19	669		1
ZIP	29090	20990	04210	14843	12839	12345	13021	13790	12345	12158	14150	12309	12828	36725	48089	46192	45015	45229	45215	44446	44485	44502	44117	43812	45216	44047	44110	44110	44110	45660	45246	44112	52655	51401	51401	95670	94601	91761	92806	94566	91710	91605	95125		
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CILX	PLAINVILLE	BRIDGEPORT	AUBURN	WATERFORD	HUDSON FALLS	SCHENECTADY	AUBURN	JOHNSON CITY	SCHENECTADY	SELKIRK	TONAMANDA	MTSKAYIJNA	FORT EDWARD	BURKVILLE	WARREN	RIVERVIEW	HAMILTON	CINCINNATI	EVENDALE	MILES	MARREN	YDUNGSTOWN	EUCL 10	COSHOCTON	CINCINNATI	JEFFERSON	CLEVELAND	CLEVELAND	RAVENNA	WARREN	CINCINNATI	E CLEVELAND	M BURLINGTON	W BURLINGTON	CARROLL	RANCHO CORDOVA	OAKLAND	ONTARIO	ANAHEIM	SUNOL	CHIND	M HOLLYWOOD	SAN JOSE		
STREET	SENT ST.		RODMAN ROAD	260 HUDSON RIVER RD	A JOHN STREET	1 RIVER ROAD	W GENESEE ST. ROAD	600 MAIN STREET	1 CAMPBELL ROAD	MORY AVENUE		DIVER POAD			14		·			403 N MAIN STREET			21800 TUNGSTEN ROAD	u	333 W SEYMOUR AVE	85 W ASTUBULA	1122 E 152ND STREET	1099 IVANHOE ROAD		1210 N PARK AVENUE		NELA PARK, NOBEL RD	1404/18 W MT PLEASAN			3920 SECURITY PARK	5441 E 14TH STREET	ONTARIO INTL AIRPORT	3601 E LA PALMA ST	6705 VALLECITOS RD	13477 YORBA	11115 VANDWEN ST	URTNER		
LOCATION	DISTRIBITION FOUIPMENT DIV.	BRIDGEPORT AREA RELATIONS OPR.	DISTR FOMT - CIRCUIT PROT	STLICONE PRODS DIV	CAPACITION TOAMS NPT	SCHENETIANY UTTENTES OF	SEMICONDISCION PRODS DPT	AFRI CONTROL SYS DPT	ELECTIONATEDIAL S BUS DEPT	MODEL DESCRIPTION	BUEGALO CEDUTOS CHOD	CABOODATE DED	CARTTO DOOR DOT	DIACTICS RESIDENCE	CARROLLY SYSTEMS DAT	DETENT SERVICE SHOP	AVIATION SERVICE DEPARTMENT	AVIATION SERVICE DEPARTMENT	AFRE	MILES GLASS PLANT	TOURS I AMP PLANT	YOUNGSTOWN LAMP PLANT	REFR METALS PROD OPT	FLECTROMATERIALS BUS DEPT	AVIATION SERVICE DEPARTMENT	JEFFERSON WELD PLANT	LIGHTING REL & OPS	CHEMICAL PRODUCTS PLANT	RAVENNA LAMP PLANT	OHIO LAMP- WARREN	CINCINNATI SERVICE SHOP	NELA PARK FACILITY	POWER DELIVERY	SWITCHGEAR BUSINESS DEPT	APPLIANCE CONTROL DEPARTMENT	MEDICAL SYSTEMS BUSINESS OPS	SAN FRANCISCO SERVICE SHOP	AVIATION SERVICE DEPARTMENT	LA SERVICE SHOP	MUCLEAR ENERGY REL & UTIL	AEBG ASO/DNTARIO-CHINO	DISTRIBUTION EQUIPMENT DIV	NUCLEAR ENERGY REL & UTIL		
EPA ID	CTD000847492	CTD001453711	MED051431906	NYD002080034	NVD00200075	NYD00200073	WYD00231222	WYD002235182	2017233301W	NVOCE BANK	040003C2000AN	016655/0001H	1214C017071N	A1 DOROGOOS	MTD044254423	MIDDENE 16622	-OHD000721456	OHO000817104	OHO000017317	OHDODA 1760A6	OHD004170040	OHD004224330	OHD004227369	OHD004302428	OHD009101494	OHD048111090	OHD048432975	OHD048433080	OHD059061317	OHD066052804	OHD074713561	OHD085240133	IAD000678037	IAD005272703	IAD075836130	CAD000819680	CAD009208075	CAD009542721	CAD030584502	CAD053914206	CAD980818512	CAT000611095	CAT000613471		
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LOCATION	CARIBE GENERAL ELECTRIC PROD
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SIREET	LAKESIDE AVENUE	APPLIANCE PARK EAST		2901 EAST LAKE ROAD	INDUSTRIAL DRIVE	- 4	ROUTE 3 BOX 310				REDMOND CIRCLE	APPLIANCE PARK BLDG	US HIGHWAY 41A	FAIRGRUVE CHUNCH KU	JOOT IN BANTO DOTVE		-	w	1501 S 19TH STREET		7555 EAST COLLINS RD	S	1540 S 54TH		1701 COLLEGE STREET	SOC NUKIH SIM SIMEEL	ZUUU IATLUK SIKEE! Turi eta storet se	FXAN JAKE		2025 49TH AVENUE N					3202 MANUK WAT		6251 ETZEL AVENUE			NW 29TH AVE	SOUTH DAWSON	1031 41K AVENUE R		
LOCATION	ADMANENT SYSTEMS DEPT	COLUMBIA R & U OPERATION	SPACE DIV-VALLEY FORGE	TRANS SYST BUS OPS	TRANS SYS BUS OPS	BRIDGEVILLE GLASS FLAMI	FUNDAME COMPT BOS DE ANT	TENNICIPAL CONTROL DEPARTMENT	STATION & CATL SYS DPT	PATTERY BUS OPT	MEDILM TRANSFORMER DPT	MA MANUFACTURING DIV	AEBG	DIST TRANS BUS DPT	MUCLEAR ENERGY BUS UP	PUBLIC CUPA BOS DIV	OTCTATATION FORT DIV		MATTON LAMP PLANT	GENERAL PURPOSE CONTROL DEPT	SPENT FUEL SERVICE OPERATION	CHICAGO SERVICE SHOP	MAJOR APPLIANCE	MA MANUFACTURING DIV	SPECIALTY TRANSF DPT	GENL PURPOSE MOTOR DPT	GENL PURPOSE MOTOR DPT	DENEMBER FUNCTIONS THE DEFI	SPECIALTY MOTOR DEPT	MINNEAPOLIS SERVICE SHOP	SPECIALTY MOTOR DEPARTMENT	DISTR TRANS BUS DPT	NEW ORLEANS SERVICE SHOP	HOUSTON SERVICE SHOP	DALLAS SERVICE SHOP	DISTRIBUTION EQUIPMENT DIV.	CT I CUITO I AMB DI ANT	SPECIALTY MOTOR DEPARTMENT	DENVER SERVICE SHOP	PORTLAND SERVICE SHOP	AVIATION SERVICE DEPARTMENT	SEATTLE SERVICE SHOP		
EPA ID	7474						VADUU3132233	•	EL DO01690924	FI 0041860451	GAD003308145	KYD006387021	KYD074047556	NCD003237948	NCD050409150	SC006/00214/	TAUGGO/07150	TI DOUG 27292	TI 0005443866	11 0005453691	TI 0062338694	11.0070015714	ILD980503023	IND000803726	∧ IND004557815		IND005448683	1ND006040299	TW000639292	/ MMT280010398		LAD043197284	LAD053782413	TXD060718269	TXD064114242	TXD079400545	KS0041917301	MODO 20 20 20 30	C00062753702	ORD001818442	WAD009278706	WAD046207379		
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SINGLE FACILITY GIVEN 2 EPA ID NUMBERS. OTHER NUMBER IS THE NUMBER THAT IS USED.
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GENERATOR ONLY
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FACILITY IS A GENERATOR ONLY.
FACILITY USING OTHER FINANCIAL MECHANISM TO PROVIDE FINANCIAL ASSURANCE
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WID006121354
TXD00128923
TXD001382206
CAD009208091
CAD0041472341
CAD077193571
CAT000623983
WAD044592491
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NUMBERS GENERATED

REGION	REGION EPA ID	DIFFREASON1
5	CTD000842492 CTD001453711 MA5570024617	CTD000842492 CLOSURE PLAN AND ESTIMATES REVISED. CTD001453711 CLOSURE PLAN AND ESTIMATES REVISED. PCLOSURE MASS70024617 HA NOT TRACKED LAST YEAR

MA NOT TRACKED LT YR. LANDFILL NOT IN RCRA PLAN CHANGE DUE TO ROUNDING CHANGE DUE TO ROUNDING MAD001408475

ADJUSTED BY 1.1 TO AVOID ADJUST IN 86. MAD060094760 MAD053449393

MAD001408517

NJD003918570 VTD002083434 MED051431906 JTD002083434

02

NJ ONLY ALLOWS USE OF THE FINANICAL TEST TO LIABILITY COVERAGE NYD002080034

CLOSURE PLAN REVISED 10/3/85 NYD002084135 NYD002080075

NO CHANGE DUE TO ROUNDING ESTIMATED DECREASED BECAUSE IT DOES NO INCLUDE THE SMALL INSULATING PLANT. CLOSURE AND PCLOSURE ESTIMATES REVISED AND BASED ON CURRENT DOLLARS. NYD052987096 NYD002235182 NYD066832023 NYD067539940 NYD002231272

CLOSURE PLAN AND ESTIMATES REVISED. 10/3/85 CITY NAME MAS INCORRECTLY RECORDED. CLOSURE AND POST CLOSURE REVISED CLOSURE PLAN AND ESTIMATES REVISED. PRD000692590 NYD071094197 NYD093256063 PRD000692582

CLOSURE PLAN AND ESTIMATES REVISED PRD090306077 PRD090282757

PR0090070459

SITE UNDER CONSENT AGRHENT/REGION 2. SUBMITTED REV. CLOSURE PLAN 7/85. AWAITING APPROVAL. LINE 3 REFLECTS UPDATED CL. COSTS CLOSURE PLAN AND ESTIMATES REVISED. FACILITY WAS ERRONEOUSLY LEFT OFF THE LIST PRD090492109 PRD090510793 PRD090383860

PRD091019224

CLOSURE PLAN AND ESTIMATE REVISED PAD059290908 PAD005033055

VAD980551782

VAD070360219

PAD075527804 VAD003132255

PAD060682622

WILL BE THE FIRST YEAR IN OPERATION ALD980600035 FLD001690924

C/PC REVISED. PLANS TO DISPOSE DEWATERED SLUDGE AT HW LANDFILL, CLOSE PONDS A & B. & SOLIDIFY SOLIDS IN POND #4. 84 CL. COST INCREASE CAUSED BY DISPOSAL OF INT WASTE THAT IS HAZARDOUS. COSTS ADDED TO ADJ. CLOSURE PLAN AND ESTIMATES REVISED. CLOSURE PLAN AND ESTIMATES REVISED GAD003308145 FL0043860451 KYD006387021

KYD074047556 NCD003237948

CLOSURE-ADD'L OPERATING UNITS WERE INCLUDED POST CLOSURE--NO.OF WELLS TESTED AND ANT OF TEST REDUCED, SO COSTS DECREASE CLOSURE PLAN AND ESTIMATES REVISED. CLSOURE PLAN AND ESTIMATES REVISED. SCD067002147 TMD078565249 FND066709130

NCD050409150

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PAD001680719

HDD04627931

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SHOULD HAVE BEEN $50K MAKING THE 85 AMT OF $52 CORRECT.
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CLOSURE PLAN AND ESTIMATES REVISED.
NO CHANGE DUE TO ROUNDING
                                 TEMPORARY EPA ID NUMBER ILT180011512
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CLOSURE PLAN AND ESTIMATES REVISED.

CAD030584502 CAD053914206 CAD00611095 CAT000613471 ORD001818442 WAD009278706

85 AMT ONLY INCLUDES CLOSURE AT PLANT 1. 84 AMT WAS FOR PLANTS 1 & 2. PLANT 2 IS AND ALWAYS WAS A GENERATOR DNLY. NO CHANGE DUE TO ROUNDING



Peat, Marwick, Mitchell & Co. Certified Public Accountants Stamford Square 3001 Summer Street Stamford, Connecticut 06905 203-356-9800

March 27, 1986

Mr. Dennis D. Dammerman
Senior Vice President - Finance
General Electric Company
3135 Easton Turnpike
Fairfield, Connecticut 06431

Dear Mr. Dammerman:

At your request, we have performed the procedures enumerated below with respect to Part B of your certificate, dated March 27, 1986, to the Environmental Protection Agency. These procedures were performed solely to assist you in connection with the filing of the above mentioned certificate, and our report is not to be used for any other purpose. The procedures we performed are summarized as follows:

- The dollar amount of tangible net worth included under item 7, Part B, certificate page 2 We compared the dollar amount of tangible net worth, which represents total shareowners' equity less goodwill and licenses and other intangible costs included in other assets, with the balance of total shareowners' equity included in the Company's 1985 Annual Report less the sum of goodwill and licenses and other intangible costs included in note 15 (other assets) on page 44 of the Company's 1985 Annual Report and found them to be in agreement.
- o The dollar amount of total assets in the U.S. included under item 8, Part B, certificate page 2 We compared the dollar amount of total assets in the U.S. with the balance of United States assets included in the Geographic segment information on page 50 of the Company's 1985 Annual Report and found them to be in agreement.
- o To determine that the negative response to item 11, Part B, certificate page 2 was correct, we compared the amount of U.S. assets included under item 8, Part B with the product of 90% times total assets as shown on the "Statement of Financial Position" page 28 of the Company's 1985 Annual Report and found that the amount under item 8 was less than the result of the computation described above.

GENERAL 🍪 ELECTRIC

Letter from Chief Financial Officer to Demonstrate Both Liability Coverage and Assurance of Closure or Post-Closure Care

March 27, 1986

Director, Ohio Environmental Protection Agency State of Ohio Environmental Protection Agency 361 E. Broad Street Columbus, OH 43216-1049

I am the chief financial officer of the General Electric Company, 1 River Road, Schenectady, New York 12345. This letter is in support of this firm's use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Chapters 3745-55 and 3745-66 of the Administrative Code.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Chapters 3745-55 and 3745-66 of the Administrative Code: See Schedule I

- 1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure is demonstrated through the financial test specified in Chapters 3745-55 and 3745-66 of the Administrative Code. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: See Schedule II
- 2. This firm guarantees, through the corporate guarantee specified in Chapters 3745-55 and 3745-66 of the Administrative Code, the closure or post-closure care of the following facilities which are owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: None
- 3. In States where U.S. EPA or a state so authorized is administrating the financial requirements of Subpart H of 40 CFR Parts 264 or 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Chapters 3745-55 and 3745-66 of the Administrative Code. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility: See Schedules III and IV
- 4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated to Ohio EPA through the financial test or any other financial assurance mechanism specified in Chapters 3745-55 and 3745-66 of the Administrative Code or equivalent or substantilly equivalent state mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None

GENERAL & ELECTRIC

Page Two

The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1985.

Part B. Closure or Post-Closure Care and Liability Coverage.

Alternative II

		(Dollars in thousands)
1.	Sum of current closure and post-closure cost estimates (total of <u>all</u> cost estimates listed above)	\$ 46,076
2.	Amount of annual aggregate liability coverage to be demonstrated	\$8,000
3.	Sum of lines 1 and 2	\$54,076
4.	Current bond rating of most recent issuance and name of rating service	Aaa - Moody's AAA - Standard & Poor's
5.	Date of issuance of bond	<u>May 1974</u>
6.	Date of maturity of bond	May 2004
* 7.	Tangible net worth (if any portion of the closur or post-closure cost estimates is included in "total liabilities" on your financial statements you may add that portion to this line)	
*8.	Total assets in the U.S. (required only if less than 90% of assets are located in the U.S.)	\$ 22,733,000 YES NO
9.	Is line 7 at least \$10 million?	<u>x</u>
10.	Is line 7 at least 6 times line 3?	<u> </u>
11.	Are at least 90% of assets located in the U.S.? If not, complete line 12	<u> </u>
12.	Is line 8 at least 6 times line 3?	<u>x</u>

I hereby certify that the wording of this letter is identical to the wording specified in Paragraph (G) of Rule 3745-55-51 of the Administrative Code as such regulations were constituted on the date shown immediately below.

GENERAL 🍪 ELECTRIC

Page Three

Dennis D. Dammerman Senior Vice President-Finance March 27, 1986

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	CLOSURE	POST-CLOSURE								
SCHEDULE II	2056	0								
SCHEDULE III	1278	0								
SCHEDULE IV	31726	11016								
TOTAL	35060	11016								
GRAND TOTAL FOR CLOSURE AN	D/OR POST-CLOSURE460	76								

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	CT0001453711	BRIDGEPORT AREA RELATIONS OPR.	AVENUE	ALIBIDA	<u> </u>	04210
		DISTR EQMT - CIRCUIT PROT	KUDMAN KUAD	ACCOUNT METON	5	05401
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		BUFFALO SERVICE SHOP	1/5 MILLENS MUMD	MISKAYIINA	¥	12309
		CORPORATE R&D	RIVER RUAD	CODY COURDS	\	12828
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	47		POLITE 3 BOX 310	WINCHESTER	_	22601
	VAD070360219	_	POLITE 29M AT TR 6066	CHARLOTTESVILLE	_	22901
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Statement of Fina sial Responsibility

In Share Owners of General Electric Company
The financial information in this Report, including the
audited financial statements, has been prepared by General
Electric management. Preparation of these statements and
data involves estimates and the use of judgment. Accounting principles underlying the financial statements are generally accepted in the United States and are consistent with
standards issued by the International Accounting Standards Committee. However, in a few important instances,
which are commented on in note 1 on page 38, there is no
single specified accounting principle or standard. Where
management makes a choice from reasonable, accepted alternatives, it uses methods which it believes are prudent
for GE.

To safeguard share owner assets, it is important to have a sound but dynamic system of internal financial controls and procedures which balances benefits and costs. One of the key elements of GE's internal financial controls has been the Company's success in recruiting, selecting, training and developing professional financial managers. Their responsibilities include implementing and overseeing the financial control system, reporting management's stewardship of the assets entrusted to it by share owners, and accurate and proper maintenance of the accounts.

Management has long recognized its responsibility for conducting the Company's affairs in an ethical and socially responsible masser. The commitment to this responsibility is reflected in key written policy statements. These cover, among other subjects, potentially conflicting outside business sizes as a comployers, compliance with antitrust laws and proper domestic and international business practices. General Electric's intention to maintain the

highest standards of conduct and practices with respect to transactions with the United States government was reaffirmed in a written policy in 1985. This policy and related vigorous actions emphasize to all employees that even the appearance of impropriety can erode public confidence in the Company and in the government procurement process. Ongoing education, communication and review programs are designed to create a strong compliance environment and to make it clearly understood that deviation from Company policies will not be tolerated.

Peat, Marwick, Mitchell & Co. provide an objective, independent review of management's discharge of its obligations relating to the fairness of reported operating results and financial condition. Their report for 1985 again took no exceptions to the Company's financial statements.

The Audit Committee of the Board (consisting solely of Directors from outside GE) maintains an ongoing appraisal, on behalf of share owners, of the effectiveness of the independent public accountants, the Company's staff of corporate auditors and GE management, with respect to preparation of financial statements, and of the adequacy of internal financial controls. The committee also reviews the Company's accounting policies, internal accounting controls, and the Annual Report and proxy material.

Dennis D. Dammerman Senior Vice Possident

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February 14, 1986

John F. Welch, Jr.

Chairman of the Board and
Chief Executive Officer

Report of Independent Cortified Public Accountants

Christians

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in our opinion, the aforementioned financial statements appearing on pages 26, 28, 30 and 38-51 present fairly the financial position of General Electric Company and consolidated affiliates at December 31, 1985 and 1984, and the results of their operations and the changes in their financial position for such of the years in the three-year period ended December 31, 1985, in conformity with generally accepted accounting principles applied on a consistent basis.

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Peat, Marwick, Mitchell & Co. 345 Patk Avenue, New York, N.Y. 10154



CORPORATE

ACCOUNTING

GENERAL ELECTRIC COMPANY...... FAIRFIELD, CONNECTICUT 06431

SERVICES

January 13, 1983

ADDITIONAL INFORMATION IS FILED WITH

Regional Administrators
United States Environmental Protection Agency 040 004 276 17/

The General Electric Company submitted its demonstration of Financial Responsibility for Liability Coverage and Closure and/or Post Closure Care for its hazardous waste facilities on June 28, 1982. Attached are amended documents which reflect non sudden accident liability coverage as well as some changes in sites covered and minor revisions to cost estimates. These changes do not affect the results of the financial test mechanism.

Very truly yours,

S. D. Spencer

Consultant - External Financial

Information

SDS: avs

Attachment

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